

**Enforceable Undertaking proposal**

Date: **28 SEPTEMBER 2018**

Undertaking to – The Regulator for the purposes of part 11 of the *Work Health and Safety Act 2011* (**the Act**).

by the Australian Capital Territory

**Privacy statement**

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## SECTION 1 - GENERAL INFORMATION

### a. Details of the person proposing the undertaking

<i>Address:</i>	<b>The Territory, ACT Education Directorate Level 6, 220 Northbourne Ave, BRADDON ACT 2612</b>
<i>Postal address (if different from residential address):</i>	GPO Box 158, Canberra City ACT 2601
<i>Telephone contact number:</i>	(02) 6205 9156
<i>Mobile contact number:</i>	
<i>Email address:</i>	DGEDUoffice@act.gov.au
<i>Legal structure:</i>	Australian Capital Territory
<i>Type of business:</i>	ACT Education Directorate - Education Services to the Community
<i>Commencement date of the entity:</i>	On the commencement of self-government
<i>Number of workers: (Full Time / Part Time)</i>	5,663.1 FTE (6,814 headcount)
<i>Products and Services:</i>	The Education Directorate delivers quality public school and early childhood education to shape every child's future and lay the foundation for lifelong development and learning. The Directorate also registers non-government schools and regulates the early childhood and care sector in the ACT. The Directorate identifies education priorities and the development of strategies, policies and planning for improved learning outcomes through the 87 ACT Government schools.
<i>Definitions:</i>	"The Territory" in this document refers to the Territory as represented by the ACT Education Directorate

### b. Details of the alleged contravention

It is alleged by WorkSafe ACT that between 2016 and 2018 in the Australian Capital Territory, the Territory had a health and safety duty within the meaning of section 30(a) of the Act, specifically the primary duty of care required by section 19 of the Act, and it failed to comply with that duty.

### c. Details of the events surrounding the alleged contravention, e.g. incident details

WorkSafe ACT alleges that between February 2016 and October 2018 the Territory did not comply with its primary health and safety duty pursuant to section 19 of the Act as it did not do all that was reasonably practicable to ensure the health and safety of its staff, by:

- (a) applying inconsistent or inadequate controls to workplace hazards associated with student behaviours
- (b) failing to adequately adjust controls following incidents or changes in circumstances
- (c) failing to provide adequate training to staff in the application of controls identified

As a result, staff were exposed to a risk of injury, and were in fact injured, including in the following three schools:

### **1. School A**

Between 2 February 2016 and 5 July 2016, a staff member of School A received multiple injuries from kindergarten aged students identified as having disabilities and complex needs and challenging behaviours. The staff member worked in a small class of eight kindergarten students.

The staff member reported incidents involving multiple injuries which ultimately resulted in a psychological injury and an accepted compensation claim.

On multiple occasions the staff member reported injuries sustained from students in the kindergarten. The reports through the Territory's incident management system were responded to by the school and visible to the Education Directorate. However, the proposed amendments to controls were not communicated effectively or implemented in a timely way.

The risk assessments and associated controls (represented in individual learning plans or behaviour management plans) were inadequate as the staff member continued to be subjected to harm. The strategies applied did not adequately mitigate the risk and protect the staff member from injury.

### **2. School B**

In October 2016, a teacher was hospitalised following a non-directed kick by a kindergarten aged student (the same student had been identified to be involved in multiple violent incidents through the year).

Between February 2017 and March 2017 several staff members received injuries following incidents with a kindergarten aged student with complex needs and behaviours, including bites, scratches, punches and kicks. One of the staff members was pregnant at the time of many of the incidents which included strikes to her abdomen.

The Territory was provided with written evidence of the impact of incidents of occupational violence by a number of staff at the school. The risk assessments and associated controls (represented in individual learning plans, behaviour management plans and work health and safety risk assessments) were inadequate as staff members continued to experience these incidents and the strategies did not adequately eliminate or mitigate the risk.

### **3. School C**

In February 2017 a lower high school student who had previously been assessed as having complex needs and challenging behaviours that presented extreme risks to self and high risk to others, threw a computer monitor at a teacher, narrowly missing the teacher. The student abused, threatened and assaulted the teacher.

The student attended school on a part-time basis as part of the overall risk management plan. The risk assessment identified a range of controls designed to mitigate the risk and these controls, when applied, did not adequately reduce risk to staff.

The Territory failed to provide adequate training to the staff members in how to reduce or avoid incidents of occupational violence.

WorkSafe ACT issued an Improvement Notice to the Education Directorate on this issue. The requirements of the notice were met, and the notice was lifted on 16 May 2017.

**d. An acknowledgement that Work Safe ACT alleged a contravention has occurred**

The Territory acknowledges that WorkSafe ACT has alleged that the Territory contravened the Act.

**e. The details of any injury that arose from the alleged contravention**

Injuries sustained include soft tissue and skin injuries (such as bruising, contusions, cuts, scratches) and psychological injuries.

**f. The details of any enforcement notices issued that relate to the alleged contravention:**

WorkSafe ACT issued an Improvement Notice relevant to a system to manage risks related to occupational violence following an incident at School C. The requirements of the Improvement notice were met, and the notice was lifted on 16 May 2017.

**g. A statement of assurance about future work health and safety behaviour**

The Director-General Education, as the person accountable to the Minister for the efficient and effective management of Education, is committed to complying with their obligations under the Act and ensuring, so far as reasonably practicable, the health and safety of all workers and those who may be affected by its business or undertaking. The Director-General Education, on behalf of the Territory, will, so far as reasonably practicable provide a safe and healthy workplace for its workers, students and others.

**h. The details of the type of workers compensation provided (if the injured person(s) is a worker of the person)**

The injured persons have been supported through workers' compensation arrangements. Compensation included: incapacity benefits, medical and rehabilitation expenses.

**The details of the support provided, and proposed to be provided, to the injured person(s) to overcome the injury/illness**

Does the contravention involve injury to person?

Yes. |

In addition to the compensation and injury management support, the workers were also offered access to the employee assistance program.

**i. If the matter involves a fatality or very serious injury<sup>1</sup>, a claim to demonstrate that exceptional circumstances exist that the enforceable undertaking is a more appropriate response than pursuing prosecution**

Does the contravention involve a fatality or very serious injury<sup>1</sup>?

Yes  No

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<sup>1</sup> 1. An injury that has caused nervous system damage liable to lead to mental incapacity or permanent restriction of mobility or involves a major amputation of a limb or parts of the body, for example, amputation above the knee or elbow. This term is not defined in the Act; it is used within this document to identify certain circumstances which will trigger additional steps in the enforceable undertaking process.

**j. The details of any existing occupational health and safety management system at the workplace including the level of auditing currently undertaken**

The Education Directorate's safety management system was audited in December 2013. The recommendations of the audit were implemented under the oversight of the Education Directorate's Audit Committee.

In 2015, a new iteration of the Education Directorate's safety management system was implemented. The framework outlines the systems and practices designed to enable Education to identify and control health and safety risks, reduce the prevalence of incidents, and ensure compliance with the Act.

A due diligence audit of work health and safety in schools was undertaken early December 2016. The audit was undertaken by Health and Safety professionals from the Work Safety team in the Chief Minister, Treasury and Economic Development Directorate.

An independent assessment of the systems to mitigate the risks of occupational violence commenced in January 2017. The review by David Caple and Associates focused on the requirements of a systems approach for the prevention of physical and psychological injury to Principals, teachers and Learning Support Assistants arising from incidents of occupational violence within ACT schools.

The Education Directorate also conducts annual internal audit assurance of the implementation of safety management systems in selected sample schools.

A work health and safety audit will be conducted during October and November 2018, with audit outcomes delivered in December 2018. This audit will be compliant with Australian Standard 4801 and will be tested across a sample of 12 schools and the Education Support Office.

**k. The details of any consultation undertaken within the workplace regarding the proposal of an enforceable undertaking**

A working group comprising the Deputy Director-General, Executive Director - Business Services Division, Deputy Director-General Strategy and Policy Reform, Executive Director – School Improvement, Executive Director – Service Design and Delivery, Director – Student Engagement, Director – People and Performance was formed to consider the strategies proposed by the Territory in response to the alleged contraventions.

Consistent with its consultation obligations under the Act, the Education Directorate will consult with all affected staff, Directorate Health and Safety Representatives and the Directorate's consultative committee about the agreed terms of the enforceable undertaking.

**l. A statement of regret that the incident occurred (i.e. not an admission of guilt)**

The Education Directorate as an emanation of the Territory, its officers and its employees are deeply committed to the safety of all workers, students and visitors. The Territory sincerely regrets that there have been incidents of occupational violence in some ACT Schools and extends its sympathy to the affected workers and any others who may have been affected by these incidents.

The Territory is committed to ensuring, so far as reasonably practicable, the ongoing health and safety of its workers, students and visitors. This undertaking provides it with the ability to make further improvements in relation to health and safety within the Education Directorate and its workforce, for the benefit of its workers and students.

### **m. Any rectifications made as a result of the contravention**

The Territory recognises that the health, safety and wellbeing of its workers and other persons are of primary importance. The Territory is committed to

- achieving the highest work health and safety standards for workers and other persons;
- providing a clear policy framework that supports setting health and safety objectives;
- satisfying applicable legal requirements related to work health and safety;
- fostering accountable, effective and supportive leadership;
- taking all reasonably practicable measures to eliminate or, where that is not possible, minimise risks to the health, safety and welfare of workers using a hierarchy of controls;
- driving continuous improvement of health and safety management to enhance the health and safety of its workplaces, support those workers who do become injured/ill and reduce the human and financial costs of injury;
- involving workers at all levels in health and safety decision-making processes;
- ensuring workers and other persons understand their health and safety obligations; and
- implementing an appropriate and coordinated response if an incident does occur, including providing work-based rehabilitation opportunities where required. This statement of policy confirms this commitment

Since the alleged contraventions, the Territory has initiated a system-wide review of the Education Directorate's occupational violence approach. This has led to the strengthening of the Directorate's architecture to support occupational violence with a focus on two main areas:

1. Improving organisational culture and training specific to occupational violence; and
2. Recalibrating the Directorate's risk management strategy in relation to occupational violence.

In particular:

- In response to the events of 2016, in August 2016 the Education Directorate commenced work to identify and treat risks associated with occupational violence in ACT public schools. The program of work included a joint Australian Education Union/Education Directorate working group, formed on 30 August 2016, to progress a program of agreed work. Products from this collaboration includes an Occupational Violence Management Policy and Plan, support documents and products for use in schools and classrooms throughout the ACT Public School system
- In November 2016, the Director-General hosted three workshops where the key risks and treatments associated with occupational violence in schools were explored and mapped. The Director-General also wrote to Principals (and all staff) regarding work health and safety responsibilities and obligations under the Act.
- the Education Directorate has continued to implement team teach training, which provides a whole setting holistic approach to behaviour management, including the importance of de-escalation strategies. Team teach training supports staff to use positive and protective personal safety skills to minimise risk to all involved. Since the commencement of 2016, 2678 staff have participated in training.

In December 2016, the Education Directorate formalised its Occupational Violence Safety Management System project. This program of work included:

- training for all principals - delivered in December 2016 by the former WorkSafe ACT Commissioner Mark McCabe. The training focused on work health and safety and due diligence.

- training for staff – delivered by principals at all schools using the resources from Mark McCabe focusing on work health and safety and due diligence.
- teleconferences with all principals –Director-General Education held teleconferences with principals on work health and safety and due diligence on 7 December 2016.
- discussions about work health and safety at staff meetings - Principals and Directors – School Improvement (the supervisors of principals) were directed to ensure that work health and safety was an agenda item at staff meetings and at all network meetings (network is a meeting of principals of up to 23 schools based on their geographic location).
- a due diligence audit of work health and safety in schools - undertaken early December 2016. The audit was undertaken by Health and Safety professionals from the WorkSafety team in the Chief Minister, Treasury and Economic Development Directorate. The audit made recommendations regarding training; consultation; mentoring; reporting; training records; risk assessments and registers; support services; and policies and procedures. These recommendations were implemented.
- streamlining operations to ensure a co-ordinated approach to support injured staff – this includes timely phone and email contact with injured staff from the Education Directorate injury management team.
- a review of risk management processes to ensure that risk assessments are reflective of work health and safety risks, the controls are in line with the hierarchy of control and applied within the context of behaviour management planning, the learning process and student context. Work health and safety professionals work closely with, schools and the Education Directorate’s specialist educators and/or allied health team to provide contemporary risk assessments and associated controls designed to mitigate risk and ensure the safety of staff and students.
- an independent assessment of the systems to mitigate the risks of occupational violence – engaged in December 2016. The review by David Caple and Associates focused on the requirements of a systems approach for the prevention of physical and psychological injury to Principals, teachers and Learning Support Assistants arising from incidents of occupational violence within ACT schools. This report recommended further training for staff working with students with complex needs, work health and safety risk assessment process and student case management approach, improving data capture for occupational violence incidents, develop closer working relationships with Universities to ensure pre-educators and early educators are provided placements and support to teach students with complex needs. The four main recommendations of the review were accepted in April 2017. The recommendations from this review are well advanced in their implementation.
- the Director-General undertaking consultation with staff in May 2017 on the proposed draft occupational violence policy and plan. The new policy was launched in July 2017. A suite of tools and initiatives complemented the policy and were developed to enhance the management of Occupational Violence. Tools include: posters and email banners, risk assessment tools and a renewed intranet page on Occupational Violence Management.
- training learning support assistants through a whole school professional learning or through targeted learning support assistant sessions. This one-day trauma training workshop outlines principles of neuroscience that inform good practice in education and participants develop an understanding of the prevalence and impact of trauma.
- the ACT Government provided \$0.9 million in the 2017-18 Budget for additional work health and safety staff resources to support schools to implement changes to practice and better manage this risk. Staff identified as part of this initiative have been engaged.

- in December 2017, the Education Directorate implemented an initial pilot training program with 14 Learning Support Assistants completing their Certificate IV in Education Support with the Canberra Institute of Technology. The pilot enabled the participants to build their capability to work with students, particularly those with complex needs and challenging behaviour.
- as of September 2018, 48 schools have participated in occupational violence training.
- the ACT Government has provided \$5.6 million over the forward estimates to support the enhancement and development of sensory spaces into schools where staff are able to support students with complex needs and challenging behaviour to manage their sensory needs. Factsheets and professional learning for this initiative have been developed for schools to support them in creating sensory spaces within the school environment. At September 2018 approximately \$5.3m has been spent.

As part of the Schools for All Program, the Education Directorate focussed on ongoing capability development of the workforce with regard to meeting the changing needs of students. This development and training had a particular focus on responding to students with complex needs and challenging behaviour.

The Education Directorate executive, through the Education Governance Committee, reviews workplace health and safety matters as monthly a standing item.

The implementation of the new occupational violence policy and management plan is progressing.

Total amount spent on rectifications  
(relevant to Occupational Violence):

**\$ 7.67 million**

**n. An acknowledgement that the enforceable undertaking may be published and publicised**

The Territory acknowledges that the undertaking may be published on the WorkSafe ACT website and may be referenced in WorkSafe ACT’s publications.

**o. A statement of ability to comply with the terms of the enforceable undertaking**

The Territory has the financial ability to comply with the terms of this undertaking.

**p. Statement regarding relationships with beneficiaries**

The Territory has a relationship with each and every beneficiary as the relevant body politic.

**q. Intellectual property licence**

The Territory grants WorkSafe ACT a permanent, irrevocable, royalty free, worldwide, non-exclusive licence to (subject to law, and any obligations of confidentiality):

- (1) use;
- (2) reproduce; and
- (3) distribute, electronically transmit, and electronically distribute to authorised officers,

to the extent reasonably necessary for WorkSafe ACT to undertake its regulatory functions, any written progress or other reports required to be developed by the Territory and provided to WorkSafe ACT under this undertaking.

**r. The person may be required to provide a statutory declaration**

Noted.



#### **s. Acknowledgement of enforceable undertakings overview and guidelines**

The Director-General Education, on behalf of the Territory, has read and understood the Enforceable Undertakings Overview (WSACT HB 0069 Enforceable Undertakings – Guidelines, Version 2018:1) accessible on WorkSafe ACT website and downloaded by the Education Directorate on 12 September 2018.

## **SECTION 2 – ENFORCEABLE TERMS**

#### **a. A commitment to the ongoing effective management of work health and safety risks**

The Territory undertakes to implement each of the strategies set out in “Section d” below at the latest two years from the date the Territory entered the undertaking.

#### **b. A commitment to disseminate information about the undertaking to workers, and other relevant parties (which may include work health and safety representatives), and in the annual report (if applicable)**

The Director-General Education, on behalf of the Territory, will communicate to all staff of the Education Directorate either electronically or in writing of the existence of the undertaking and provide details of where the undertaking can be accessed or viewed within 30 days of the Territory entering the undertaking.

The Director-General Education, on behalf of the Territory, will make available on its website an electronic copy of the undertaking and provide a copy either electronically or in person to the Australian Education Union, the ACT Council of Parents and Citizens Associations and the Community and Public Sector Union.

#### **c. A commitment to participate constructively in all compliance monitoring activities of the Undertaking**

It is acknowledged that responsibility for demonstrating compliance with this undertaking rests with the Territory.

Evidence to demonstrate compliance with the terms will be provided to WorkSafe ACT by the due date for each term and in line with the evidence identified under each strategy (items Section 2d-f). The evidence provided to demonstrate compliance with the undertaking will be retained by the Territory until advised by WorkSafe ACT that the undertaking has been completely discharged. It is acknowledged that any failure to meet the due date for an enforceable term will result in the matter being escalated and may lead to alternative enforcement action.

It is acknowledged that WorkSafe ACT may undertake other compliance monitoring activities to verify evidence and compliance with an enforceable term, and cooperation will be provided to WorkSafe ACT. It is acknowledged that WorkSafe ACT may initiate additional compliance monitoring activities, such as inspections, as considered necessary at WorkSafe ACT’s expense.

## **STRATEGIES THAT WILL DELIVER BENEFITS TO WORKERS, INDUSTRY AND THE COMMUNITY.**

### **d. STRATEGIES THAT WILL DELIVER WORKER BENEFITS**

#### **Strategy 1 – Fully implement the Education Directorate’s Occupational Violence Policy and Management Plan**

##### **Scope/Description**

The Territory, as represented by the Education Directorate, undertakes to fully implement the Occupational Violence Policy and Management Plan. It will:

- a) strengthen the implementation of risk assessments; such risk assessments to include a list of reasonably practicable steps having regard to other legislative obligations relevant to the education sector, that can be taken to eliminate or minimise risk to the health and safety of individual staff;
- b) establish and implement assurance mechanisms to ensure the adequacy of the controls contained in the relevant risk assessments;
- c) review the Education Directorate’s mandatory work health and safety training package and provide role specific work health and safety training to learning support assistants and teachers;
- d) strengthen site specific work health and safety training based on the site’s specific work health and safety risk assessments and identified mitigations;
- e) a demonstrated commitment to fund 50 Learning Support Assistants for a Certificate IV Education Support in the next 12 months. This will build staff capability to work with students, particularly those with complex needs and challenging behaviour;
- f) all remaining schools (approximately 39) will participate in occupational violence training by the end of Term 4 2018;
- g) all staff will be invited to attend two wellbeing expositions focusing on health, safety and wellbeing in October 2018;
- h) launch an internal communications campaign in schools to promote incident reporting and the role of supervisors in responding to incidents and share the communication campaign with other ACT Government Directorates;
- i) strengthen and promote the information and referral hotline for staff to seek advice and assistance on work health and safety matters;
- j) seek feedback from staff (school and office based) about any disincentives to report workplace injuries and address any disincentives within the Education Directorate or pass on to any whole of Government review of injury reporting mechanisms any disincentives;
- k) in the order of \$300,000 will be spent in the enhancement and development of sensory spaces in schools to support students with complex needs and challenging behaviour to manage their sensory needs; and
- l) monitor incident reporting for trends and report monthly to the executive responsible for work health and safety and the Education Governance Committee on trends and actions necessitated thereby.

The Education Directorate’s Audit Committee will monitor the implementation of this term for the 12 months from the date of the undertaking.

**Estimated Cost:** \$2.225m in the engagement of an additional four full time employees, external expert services and other resourcing, or equivalent, over a two-year period.

## Safety Outcome

The implementation of the Occupational Violence Policy and Management plan will provide for:

1. consistent risk assessments (reflecting risk to staff, students and others);
2. consistent application of work health and safety controls; and
3. improved work health and safety resources within the Education Directorate to combat occupational violence.

## Evidence

Evidence of completing this term is:

- a) risk assessment templates and guidance material that outlines control types;
- b) a procedure that outlines the assurance mechanisms regarding the adequacy of the controls;
- c) sample of the mandatory work health and safety training package;
- d) evidence of attendance by staff at the role specific work health and safety training at a sample of twelve schools;
- e) evidence of training on new risk plans at a sample of twelve schools;
- f) copy of the internal communications campaign documents;
- g) copy of the artefact produced following feedback from staff (school and office based) about any disincentives to report injuries and actions taken by the Education Directorate;
- h) copy of reports provided to the executive responsible for work health and safety over the term of this undertaking.

Total amount to be spent on benefits to workers

**\$2.225 million**

## e. STRATEGIES THAT WILL DELIVER INDUSTRY BENEFITS

**Strategy 2** – Share learnings and resources with other Education jurisdictions within Australia.

### Scope/Description

The Territory undertakes that within ten months of the Undertaking it will share its learnings and resources with other Education jurisdictions (nationally and with other sectors locally). This will be achieved through hosting a forum on work health and safety (with a focus on occupational violence) in education settings. It is proposed that this forum include participants from regulators, behaviour experts and other education agencies across Australia.

**Estimated cost:** \$50,000

## Safety Outcome

To raise the profile of the risks associated with occupational violence in the Education sector.

## Evidence

Evidence of completing this term is a copy of the materials provided to other jurisdictions in preparation for the forum.

Total amount to be spent on benefits to industry

**\$0.050 million**

## **f. STRATEGIES THAT WILL DELIVER COMMUNITY BENEFITS**

### **Strategy 3 – Building safe communities**

The Territory undertakes to work with the ACT Council of Parents and Citizens Associations to deliver three workshops (to be completed by end of term 1, 2019) that will contribute to the building of strong and safe communities for learning. The workshops will focus on ensuring the safety of staff, students and families and meeting the diverse range of student academic and wellbeing needs.

The workshops will establish a shared understanding of the problem, a shared understanding of the geneses of the issues, a raised awareness of the issue and its impact and an appropriate way to minimise and respond to violence in schools.

**Estimated cost:** \$100,000

### **Safety Outcome**

To raise the profile of the risks associated with occupational violence in the Education sector and build a joint ownership of the issue.

### **Evidence**

Evidence of completing this term is a copy of the materials provided in preparation for the workshops.

Total amount to be spent on benefits to the community

**\$0.1 million**

**Total cost of the strategies proposed**

**\$2,375,000**

**TOTAL AMOUNT TO BE SPENT ON ALL STRATEGIES (including existing rectifications and previous commitments)**

**\$10.045 million**

## **g. A commitment regarding linking the promotion of benefits to the enforceable undertaking**

The Territory is committed to linking the benefits arising from the execution of this enforceable undertaking and will do so in the ACT Education Directorate's annual report.

## **h. A commitment to establish and maintain (or maintain if a system already exists) an occupational health and safety management system (OHSMS)**

The Director-General Education, on behalf of the Territory, will maintain an occupational health and safety committee and will continue random safety audits to monitor safety issues.

## **i. A commitment to ensure the OHSMS is audited by third party auditors**

The Territory is committed to having its safety system audited by an independent auditing team which may include auditing by another Directorate audit team, in accordance with established timeframes. Reporting of outcomes through Director-General Education, to Head of Service and WorkSafe ACT must occur.

**j. A commitment to provide a copy of each finalised OHSMS audit report to WorkSafe ACT**

The Territory will provide its audit program (relevant to the enforceable undertaking) and a copy of the associated audit report and management response to WorkSafe ACT.

**k. A commitment to implement the recommendations from these audits (unless otherwise negotiated with WorkSafe ACT)**

The Territory, through the Education Directorate, commits to ensuring that any recommendations resulting from the OHSMS audit will be implemented as far as reasonably practicable, in a timeframe, to be agreed with WorkSafe ACT following receipt of the audit.

**l. Timeframe**

Within a timeframe to be agreed with WorkSafe ACT following receipt of the audit.

**m. Undertaking Reporting**

The Territory undertakes to report on the strategies of this undertaking and its implementation in the ACT Education Directorate's annual report.

SECTION 3 – OFFER OF UNDERTAKING

I offer this undertaking and commit to the terms herein.

Signed

Position

Dated at  this   
(suburb)

day of  20  18

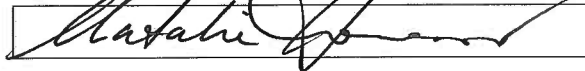
OR

As a duly authorised person of

The Australian Capital Territory "the Territory"

I give this undertaking and commit to the terms herein.

Signed (duly authorised person)



Name

Natalie Howson

Position

Director-General Education Directorate as the authorised person on behalf of the Territory

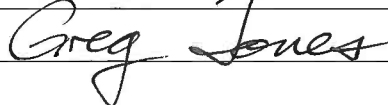
Dated at  BRADDON this  28  
(suburb)

day of  September 20  18

*The duration of an enforceable undertaking is determined by the content of the agreed terms. An enforceable undertaking commences and is enforceable once accepted by Access Canberra. The enforceable undertaking will be concluded on written advice from Access Canberra when all requirements of the undertaking have been satisfactorily executed.*

I accept this undertaking as an enforceable undertaking under section 216 of the Act.

Signed



Name

Greg Jones

Position

Delegate of the Regulator

Access Canberra

Dated at  BRADDON this  28  
(suburb)

day of  September 20  18