



Te Oranga me
Te Haumaru Ākonga

**Learner Wellbeing
and Safety**

Self-review Toolkit for Tertiary Education Providers

Tool A: gap analysis

The Education (Pastoral Care of
Tertiary and International Learners)
Code of Practice 2021

NZQA

NEW ZEALAND QUALIFICATIONS AUTHORITY
MANA TOHU MĀTAURANGA O AOTEAROA

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KIA NOHO TAKATŪ KI TŌ ĀMUA AO!

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Tool A: gap analysis

This optional tool sets out the areas of practice you need to review to check your compliance with the Code.

You can use this tool to help you:

- **Prepare** for a gap analysis, by identifying the information you need to evidence your compliance with the Code at each clause
- **Make sense** of your gathered information, by noting any gaps in your current practice and/or evidence of current practice.

KEY	
COMPLIANT	<ul style="list-style-type: none">• We have the required practices in place• We have sufficient evidence on which to make judgements about the effectiveness of our practices
GAP (in evidence)	<ul style="list-style-type: none">• We have the required practices in place but...• ...we have limited evidence on which to make judgements about the effectiveness of those practices
GAP (in practice)	<ul style="list-style-type: none">• We do not have the required practices in place

If you are a provider with student accommodation or Code signatory, you can **insert additional pages into this tool** relating to **Student Accommodation (Outcomes 5-7)** and/or **International Learners (Outcomes 8-12)** after Outcome 4.

Use the links below to download any additional pages as required:

- [Student Accommodation](#)
- [International Tertiary Learners](#)

Current number of domestic students:

Organisational structures to support a whole-of-provider approach to learner wellbeing and safety

Outcome 1: A learner wellbeing and safety system

Providers must take a whole-of-provider approach to maintain a strategic and transparent learner wellbeing and safety system that responds to the diverse needs of their learners.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
<p>Process 1: Strategic goals and strategic plans</p> <p>Clause 7 (1). Providers must have strategic goals and strategic plans for supporting the wellbeing and safety of their learners across their organisation, including student accommodation, describing how they will –</p> <p>(a) give effect to the outcomes sought and processes required by this code; and</p>	<ul style="list-style-type: none"> Health, Safety and Wellbeing Policy Mental Health Safety Policy Process for students at risk including NMT weekly reporting of students at risk. Clinical psychologists employed/contracted as staff Mentoring panel offered FrontTier services offered Profs course content includes stress management techniques 	Compliant with a review of current policies also underway.		
<p>(b) contribute to an education system that honours Te Tiriti o Waitangi and supports Māori–Crown relations.</p>	<p>Te Kaa qualification for the core College NZ staff.</p> <p>PLSC students are able to undertake their assessments in Te Reo Māori.</p>			Policy to be developed to ensure that our existing practices in this area are

	Te Reo Māori assessment courses offered.			articulated in a written procedure.
Clause 7 (2). Providers must –	Undertaken in practice, but to be incorporated into policies.			Frequency of review to be included in the relevant policies.
(a) regularly review their learner wellbeing and safety strategic goals and strategic plans as described in subclause (1); and				
(b) make amendments to their learner wellbeing and safety strategic goals and strategic plans within a reasonable timeframe following the review.				
Clause 7 (3). Providers must work proactively with learners and stakeholders (and document this work) when –	Psychotherapists as part of the College group are included in the development of systems and processes around student wellbeing.			Such meetings to be documented moving forward.
(a) developing their learner wellbeing and safety strategic goals and strategic plans described in subclause (1); and				Inclusion of student voice moving forward.
(b) reviewing their learner wellbeing and safety strategic goals and strategic plans described in subclause (2).				

<p>Process 2: Self review of learner wellbeing and safety practices</p> <p>Clause 8 (1). Providers must use strategic goals and strategic plans described in clause 7(1) to regularly review the quality of their learner wellbeing and safety practices to achieve the outcomes and practices of this code, at a frequency or by a date determined by the code administrator.</p>				<p>Frequency of review to be included in the relevant policies.</p>
<p>Clause 8 (2). Providers must review their learner wellbeing and safety practices using –</p> <p>(a) input from diverse learners and other stakeholders; and</p>				<p>End of course evaluation to incorporate question on learner wellbeing and safety.</p>
<p>(b) relevant quantitative and qualitative data (including from learner complaints) that is, as far as practicable, and consistent with the provider’s obligations under current privacy legislation, disaggregated by diverse learner groups.</p>				
<p>Clause 8 (3). Providers must, in a timely manner, following a review described in subclauses (1) and (2) take appropriate action to address any deficiencies in learner wellbeing and safety practices.</p>	<p>Feedback Review Committee process. Internal feedback review process. Customer Insights Management Team’s involvement. Quarterly reporting by College statistician.</p>	<p>Compliant.</p>		

<p>Process 3: Publication requirements</p> <p>Clause 9. Providers must make the following information readily available, in accessible formats, to learners, staff and the general public, including on their websites (where available) –</p> <p>(a) strategic goals and strategic plans for supporting the wellbeing and safety of learners described in clause 7(1); and</p>	<p>Student wellbeing page on our website includes this information, in addition to our policies page.</p>			
<p>(b) revisions to strategic goals and strategic plans for supporting the wellbeing and safety of learners described in clause 7(2); and</p>	<p>The latest versions of documents are available on the website.</p>			
<p>(c) self-review reports on the quality of their learner wellbeing and safety practices described in clause 8.</p>				<p>To be made available on our website after this first self-review is complete.</p>
<p>Process 4: Responsive wellbeing and safety systems</p> <p>Clause 10 (1). Providers must gather and communicate relevant information across their organisation (including student accommodation) and from relevant stakeholders to accurately identify emerging</p>	<p>Training provided to all College staff.</p> <p>Student wellbeing escalation process in place</p> <p>NMT weekly reporting on concerns</p>	<p>Compliant</p>		

concerns about learners' wellbeing and safety or behaviour and take all reasonable steps to connect learners quickly to culturally appropriate social, medical, and mental health services.				
Clause 10 (2). Providers must provide staff with ongoing training and resources tailored to their roles in the organisation, in relation to –	All teaching staff have undertaken Te Tiriti o Waitangi training as part of their professional qualifications. Te Kaa Cultural Competency course for core College staff in 2022.			
(a) Te Tiriti o Waitangi; and				
(b) the provider's obligations under this code; and	Staff attended the NZQA workshops on the Domestic Code in 2022.	compliant		
(c) understanding the welfare issues of diverse learner groups and appropriate cultural competencies; and	Te Kaa Cultural Competency course for core College staff in 2022.			
(d) identifying and timely reporting of incidents of racism, discrimination, and bullying; and	Feedback review processes discussed earlier in this document ensure this.	compliant		
(e) physical and sexual violence prevention and response, including how to support a culture of disclosure and reporting; and				
(f) privacy and safe handling of personal information; and	Privacy intranet page and resources available to all staff. Training provided to all new starters, and ongoing training and resources to all staff.	compliant		

(g) referral pathways (including to local service providers) and escalation procedures; and	Student wellbeing escalation process in place.	Compliant		
(h) identifying and timely reporting of incidents and concerning behaviours; and	Weekly NMT meeting reporting on concerns Training provided to all College staff.	compliant		
(i) wellbeing and safety awareness and promotion topics including – <ul style="list-style-type: none"> i. safe health and mental health literacy and support; and ii. suicide and self-harm awareness; and iii. promoting drug and alcohol awareness; and iv. promoting healthy lifestyles for learners. 	Training provided to all College staff. Weekly wellness tip emails provided to all students and staff.			
Clause 10 (3). Providers must have plans for assisting learners, and responding effectively, in emergency situations in the learning or residential community (whether localised or more widespread), including – <ul style="list-style-type: none"> (a) making these plans readily available to learners when they 	Emergency Response plan in place.			Emergency Response Plan to be made available to learners.

begin their study; and				
(b) ensuring that there are suitably prepared staff members available to be contacted by a learner, or learners, in the event of an emergency; and	Emergency Response Plan at Group level, with appropriate local contacts. Students are provided with enquiries and extensions inbox, Orientation key contacts, all instructor details made available to students.	Compliant		
(c) co-ordinating decision-making across the provider when responding to emergencies; and	Emergency Response plan at Group level.			
(d) disseminating timely, accurate, consistent, and accessible information to learners and staff during emergencies; and	Emergency Response plan at Group level.			
(e) ensuring all relevant staff are aware of the indicators of imminent danger to a learner or others and what action they can reasonably provide to help make them safe; and	Training provided to all staff and available on our learning platform as video training to new staff.			
(f) keeping a regularly updated critical incident and emergencies	Emergency Response plan at Group level.			Review Group Emergency Response plan to

<p>procedures manual which guides staff involved in emergency situations which contains the immediate and ongoing actions required including –</p> <ul style="list-style-type: none"> i. engaging with relevant government agencies (e.g. the New Zealand Police, Ministry of Health, New Zealand Qualifications Authority, Tertiary Education Commission); and ii. the follow-up debriefing processes to support all learners and relevant staff; and 				<p>ensure it incorporates the below listed agencies.</p>
<p>(g) recording critical incidents and emergencies and reporting these back annually (at an aggregate level and, as far as practicable, disaggregated by</p>	<p>WH&S registers, annual compliance registers, quarterly WH&S reporting</p>	<p>compliant</p>		

<p>diverse learner groups) to provider management, learners, other stakeholders, and the code administrator.</p>				
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Outcome 2: Learner voice

Providers understand and respond to diverse learner voices and wellbeing and safety needs in a way that upholds their mana and autonomy.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
Key required processes	Information we can gather to use as evidence of our compliance with this clause	COMPLIANT	GAP (in evidence)	GAP (in practice)
<p>Process 1: Learner voice</p> <p>Clause 12. Providers must have practices for –</p> <p>(a) proactively building and maintaining effective relationships with diverse learner groups within their organisation; and</p>	<p>Students are provided with a list of key contacts on the first day of the course, and encouraged to reach out to those key contacts.</p> <p>There are five opportunities across the 13/18 week course for students to provide feedback on the course and their experience.</p>	compliant		
<p>(b) working with diverse learners and their communities to develop, review, and improve learner wellbeing and safety strategic goals, strategic plans and practices; and</p>				To incorporate wellbeing question into the end of course survey.
<p>(c) providing formal and informal processes for actively hearing, engaging with, and developing the diverse range of learner voices and those of their communities; and</p>	<ul style="list-style-type: none"> End of course student evaluations, feedback review meetings, Course Advisory Committees, subject specific 	compliant		

	student evaluations			
(d) providing timely and accessible resources to learners to support them and their learner communities to develop the necessary skills to enable them to participate fully in decision-making processes; and	Course Regulations are made available to learners in the learning management system, as well as highlighted at Orientation and in our pre-course communications.			
(e) providing timely and accessible information to learners to increase transparency of providers' decision-making processes.	Learners are engaged in the PLSC course from between 13-18 weeks. The context of this is very relevant in that learner's engagement in decision-making. The five formal opportunities to provide feedback are a key time for us to address feedback specific to the current group of students. Due to the timing of the course being so short, learner voice is typically a tool to progress and pursue improvements for students that come after.	complaint		
Process 2: Learner complaints Clause 13.	We have a Customer Insights team available to receive complaints	complaint		

<p>Providers must –</p> <p>(a) work with learners to effectively respond to, and process complaints (including appropriate engagement with support people); and</p>	<p>if such complainants do not want to come through the NZ team. We have processes in place to regularly review written feedback and respond as necessary.</p>			
<p>(b) inform learners on how the complaint will be handled and how it is progressing; and</p>	<p>As per the above. Course Manual outlines the process.</p>	<p>Compliant</p>		
<p>(c) handle complaints in a timely and efficient way, including having practices that –</p> <ul style="list-style-type: none"> i. are appropriate to the level of complexity or sensitivity of the complaint; and ii. consider the issues from a cultural perspective; and iii. include the provision of culturally responsive approaches that consider traditional processes for raising and resolving issues (for example, restorative justice); and iv. comply with the principles of natural justice; and 	<p>We have appeals processes, and other methods of escalating complaints.</p>	<p>Compliant</p>		

<p>(d) ensure that the complaints process is easily accessible to learners (and those supporting them), including having practices for –</p> <p>i. providing learners with clear information on how to use the internal complaints processes (including the relevant people to contact), and the scope and possible outcomes of the processes; and</p>	<p>We provide emails with the contact details of our Customer Insights team, as well as regular requests for written feedback. Course manual outlines complaints process.</p>	<p>compliant</p>		
<p>ii. addressing barriers to accessing this information (for example, due to language, lack of internet access, fear of reprisal, desire for anonymity), such as providing alternative ways of raising a complaint; and</p>	<p>Complaints can be received by: email (customer insights or CAO), written anonymous feedback documents, directly to an instructor (email or phone)</p>	<p>compliant</p>		
<p>iii. providing an opportunity for a support person or people (who can be chosen by the learner) to guide and support the learner through the complaints process; and</p>	<p>Offer of a support person is made</p>	<p>Compliant</p>		

iv. providing the opportunity for groups of learners to make joint complaints; and				
(e) record complaints; and	NMT meeting minutes records concerns.			Formal process to record complaints in one document to be introduced.
(f) report annually to provider management, learners, other stakeholders, and the code administrator (including on provider websites where available) on – i. the number and nature of complaints made and their outcomes (at an aggregate level and, as far as practicable, disaggregated by diverse learner groups); and ii. learner experience with the complaints process and the outcome of their complaint; and	Weekly meeting of the Group management where any complaints are raised.	compliant		
(g) promote and publicise complaint and dispute resolution processes available to learners including, but not limited to, the provider’s internal complaints process, the education quality assurance agency	Course Manual	compliant		

<p>complaints process, the code administrator's complaints process, and the Dispute Resolution Schemes; and</p>				
<p>(h) advise learners, on the next steps available to them if the provider does not accept the complaint (or the learner or provider perceives that the provider does not have the cultural competency to deal with it), or the learner is not satisfied that the provider has made adequate progress towards resolving the complaint, or the learner is not satisfied with the provider's internal complaints process or outcome, including –</p> <ul style="list-style-type: none"> i. how to seek resolution of a contractual or financial dispute by way of a complaint or referral to an appropriate body or agency depending on the subject matter of the dispute, for example, the code administrator, the Dispute Resolution Scheme, the Disputes Tribunal, the 	<p>Reference to the appeals process available under the Regulations.</p>	<p>compliant</p>		

<p>Human Rights Commission or the Ombudsman; and</p> <p>ii. how to make a complaint to the code administrator if a learner believes that the provider is failing to meet the outcomes or requirements of this code.</p>				
<p>Process 3: Compliance with the Dispute Resolution Scheme</p> <p>Clause 14. Providers must ensure they are familiar with the relevant Dispute Resolution Scheme rules for domestic and international learners and ensure compliance with those rules in a dispute to which it is party.</p>		compliant		

Wellbeing and safety practices for all tertiary providers

Outcome 3: Safe, inclusive, supportive, and accessible physical and digital learning environments

Providers must foster learning environments that are safe and designed to support positive learning experiences of diverse learner groups.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
		COMPLIANT	GAP (in evidence)	GAP (in practice)
Key required processes	Information we can gather to use as evidence of our compliance with this clause			
Process 1: Safe and inclusive communities Clause 16 (1). Providers must have practices for –	Student code of conduct.	Compliant.		Student code of conduct to also be made available on the student wellbeing page.
(a) reducing harm to learners resulting from discrimination, racism (including systemic racism), bullying, harassment and abuse; and				
(b) working with learners and staff to recognise and respond effectively to discrimination racism (including systemic racism), bullying, harassment and abuse; and	Feedback and complaints processes discussed elsewhere in this document.	Compliant		
(c) promoting an inclusive culture across the learning environment; and				
(d) upholding the cultural needs and aspirations of all groups throughout the learning environment; and	Te Reo Māori assessment options. Dedicated instructor to support students with diverse learning needs, whether that is	compliant		

	cultural, disability or other. Other cultural needs observed and upheld as required or requested by students.			
(e) providing all learners with information – i. that supports understanding, acceptance, and connection with all learners, and collective responsibility for an inclusive learning environment; an ii. about the cultural, spiritual, and community supports available to them; and	Student code of conduct	Compliant		
(f) providing learners with accessible learning environments where they can connect with others, build relationships, support each other, and welcome their friends, families, and whānau.	Opportunities offered throughout the course to engage with peers through classroom interaction (online, onsite), discussion forums, student lounges provided in onsite environments.	compliant		
Process 2: Supporting learner participation and engagement Clause 17 (1). Providers must provide learners with opportunities to – (a) actively participate and share their views safely in their	Five formal opportunities to do this throughout the 13/18 week course. Informal opportunities			

learning environment; and	presented by instructors.			
(b) connect, build relationships and develop social, spiritual and cultural networks; and	Opportunities offered throughout the course to engage with peers through classroom interaction (online, onsite), discussion forums, student lounges provided in onsite environments.			
(c) use te reo and tikanga Māori to support Māori learners' connection to identity and culture.	Students who choose to do so can do their assessments in Te Reo Maori, with Tikanga practices. Other Te Reo Māori activities incorporated for all students throughout the course.	compliant		
Clause 17 (2). Providers must have practices for supporting learners through their studies, including – (a) enabling learners to prepare and adjust for tertiary study, and	Our learners have already been through tertiary study. This is a professional qualification. Dedicated instructor to support students with diverse learning needs, whether that is cultural, disability or other.	Compliant.		

(b) maintaining appropriate oversight of learner achievement and engagement; and	Low grades process.	Compliant.		
(c) providing the opportunity for learners to discuss, in confidence, any issues that are affecting their ability to study and providing learners with a response to their issues; and	Extensions inbox. Customer Insights Team.	Compliant.		
(d) providing learners with advice on pathways for further study and career development, where appropriate.	Admission information provided. Mentoring Panel offered. Career portal and jobs board offered.	Compliant.		
<p>Process 3: Physical and digital spaces and facilities</p> <p>Clause 18. Providers must have practices for–</p> <p>(a) providing healthy and safe learning environments; and</p>	Health, safety and wellbeing policy Discrimination policy Student Code of Conduct.	compliant		
(b) identifying and, where possible, removing access barriers to provider facilities and services; and	<p>Online information presented in an accessible format.</p> <p>Responsive to needs of learners with access or disability concerns as required.</p> <p>Wrap around services provided for no cost to the student – mentoring panel,</p>	Compliant		

	dedicated learning support where required, wellness tips, psychotherapist support, etc.			
(c) involving learners in the design of physical and digital environments when making improvements; and	Learners involved in research and focus groups regarding the online learning platform and ongoing improvements. Online learning environment feedback is obtained and responded to as part of the feedback process.	Compliant.		
(d) engaging with Māori and involving Māori in the design of physical and digital environments where appropriate.	Māori cultural advisor engaged by the College and involved in the lefthand mentioned items, in addition to various other initiatives.	Compliant		

Outcome 4: Learners are safe and well

Providers must support learners to manage their physical and mental health through information and advice, and identify and respond to learners who need additional support.

Phase in the gap analysis process:	PREPARE	MAKE SENSE		
		COMPLIANT	GAP (in evidence)	GAP (in practice)
Key required processes	Information we can gather to use as evidence of our compliance with this clause			
<p>Process 1: Information for learners about assistance to meet their basic needs.</p> <p>Clause 20 (1). Providers must have practices for enabling all learners and prospective learners to identify and manage their basic needs (the essential material requirements to support wellbeing and safety including housing, food and clothing), including providing accurate, timely and tailored information on how they can –</p> <ul style="list-style-type: none"> (a) access services through the provider or through community and public services that will help them maintain reasonable standards of material wellbeing and safety; and (b) access suitable accommodation and understand their rights and obligations as a tenant in New Zealand; and (c) maintain a healthy lifestyle. 	<p>Process of identifying at risk students and escalation process mentioned elsewhere in this document.</p> <p>Education Support team available to provide assistance to students with the left hand mentioned items.</p>	compliant		

<p>Clause 20 (2). If food is made available by the provider on campus or in student accommodation, the provider must ensure that the food available includes a range of healthy food options that is obtainable at a reasonable cost.</p>	Not applicable			
<p>Process 2: Promoting physical and mental health awareness</p> <p>Clause 21. Providers must have practices for –</p> <p>(a) providing opportunities and experiences for learners that improve their physical and mental health and wellbeing and safety; and</p>	<p>This is a 13 or 18 week professional course that students typically undertake while being in employment, and is largely undertaken online. As such, the applicability of this clause is limited by the scope of involvement within the whole of a student's life/activities. However as an organisation we see our responsibility as promoting the overall wellbeing of the legal profession. As a group we engage in multiple activities in this space. For our students specifically, they obtain wellbeing tips emails weekly and access to a mentoring panel.</p>	compliant		
<p>(b) promoting awareness of practices that support good physical and mental health that are credible and relevant to learners; and</p>	Weekly wellness emails	complaint		
<p>(c) supporting learners' connection to their language, identity, and culture; and</p>	Te Reo Maori assessment courses offered.			

	Financial and other support to a range of cultural law societies.			
<p>(d) providing accurate, timely information and advice to learners about –</p> <ul style="list-style-type: none"> i. how they can access medical and mental health services through the provider or through community and public services, including culturally responsive services; and ii. how they can report health and safety concerns they have for their peers; and iii. how to respond to an emergency and engage with relevant government agencies; and iv. how they can make positive choices that enhance their wellbeing. 	<p>This is a 13 or 18 week professional course that students typically undertake while being in employment, and is largely undertaken online. As such, the applicability of this clause is limited by the scope of involvement within the whole of a student's life/activities.</p> <p>However, our Education Support team do support individual learners with these matters, where required.</p>			
<p>Process 3: Proactive monitoring and responsive wellbeing and safety practices.</p> <p>Clause 22 (1). Providers must have practices for –</p> <p>(a) requesting that domestic learners 18 years and over provide a name and up-to-date contact details of a nominated person; and</p>		complaint		
<p>(b) describing the circumstances in which the nominated person referred to in paragraph (a) should be contacted in relation to their wellbeing and safety; and</p>				To review enrolment form to confirm this is stipulated.

(c) contacting the person nominated by domestic learners 18 years and over, in the circumstances described in accordance with paragraph (b), or where the provider has reasonable grounds for believing that the disclosure is necessary to prevent or lessen a serious threat to the student's life or health; and		Compliant		
(d) enabling learners to communicate health and mental health needs with staff in confidence, including accommodation staff, so that the provider can proactively offer them support; and	Various methods of communicating these issues – multiple communication channels made available to students	compliant		
(e) providing opportunities for learners to raise concerns about themselves or others in confidence; and	As above	complaint		
(f) identifying learners at risk and having clear and appropriate pathways for assisting them to access services when they need it; and	Processes discussed elsewhere in this report.	complaint		
(g) identifying learners who are at risk of harming others, and i. having clear and appropriate pathways for assisting them to access services when they need it; and	Processes discussed elsewhere in this report.	complaint		
ii. protecting learners and staff who experience harm from other learners and/or staff, including sexual assault; and	Processes discussed elsewhere in this report.	complaint		
(h) making arrangements with disabled learners or those affected by health and wellbeing difficulties to accommodate learning needs, including for study off-campus; and	Process for supporting disabled learners in place. Each person is individually communicated with and relevant individual plans in place.	compliant		
(i) responding to disruptive and threatening behaviour in a way that is sensitive to a learner's		compliant		

situation; and				
(j) supporting learners whose study is interrupted due to circumstances outside their control, and providing inclusive, accessible re-entry processes for their transition back into tertiary study.	PLSC Regulations are governed by the NZ Council of Legal Education and have specific regulations in regards to these matters. However our Education Support team work within the regulations to achieve a fair and equitable result for all students that are interrupted by life circumstances.	Compliant		
Clause 22 (2). Providers must have up-to-date contact details and next of kin for domestic tertiary learners under 18 and international tertiary learners.		Not applicable		
Clause 22 (3). Providers must contact the next of kin for domestic tertiary learners under 18 years and international tertiary learners if there is concern regarding the wellbeing or safety of a learner.		Not applicable		
Clause 22 (4). Providers must maintain a record of reported risks, including any concerns raised in relation to the effective administration of this code.	WHS Registers, Quarterly Reporting, and biannual compliance checks	compliant		