

## AIHS 2022 Submission to the Independent Reviewer of SafeWork SA

### Executive Summary

The Australian Institute of Health & Safety (AIHS) and its SA Branch notes that on most indicators published by Safe Work Australia (SWA), SafeWork SA (SWSA) is around the national average or the middle of its jurisdictional peers. We consider that SWSA has made major improvements since the negative inquiry results in 2017 and 2018, particularly in compliance and enforcement investigation and briefs of evidence and has helpfully shared its better practice with WHS and other regulators around Australia through Martyn Campbell as chair of HWSA. SWSA has encouraged strong relationships with AIHS and among academic researchers and experts. The focus of our submission is on what additional changes may lead to even better regulatory practice and outcomes. This requires an appropriate balance between proactive and reactive activities and being resourced to deal with shorter and longer term WHS hazards and issues. The AIHS continues to support the harmonisation goals of the 2008 COAG OHS Intergovernmental Agreement, where we hope for additional uniformity such as in relation to Industrial Manslaughter.

The AIHS submits the following eleven priorities for consideration by the Independent Reviewer:

1. The need for proactive SWSA enforcement of officer due diligence requirements, especially for boards/senior management of high-risk bodies, but more broadly using poor practice examples
2. SWSA encouragement, ideally in Regulation, of increased professionalism and competency among WHS practitioners and professionals with potential penalties for those who offer seriously incompetent advice
3. Developing a balance for longer- and shorter-term hazards using appropriate in-house and external expertise, e.g., carcinogens, silicosis, psychological injury and body stressing can be longer-term
4. Establishment of a peak Ministerial advisory body including WHS experts (and an independent chair) replacing the WHS functions of the current Industrial Relations Consultative Council
5. Ensuring that SWSA is well placed to address the emphases in the imminent new national WHS strategy and emerging issues such as climate change and WHS, insecure work, harassment, and new technology such as automation, robotics and augmented/virtual reality
6. Full adoption of the 2022 WHS psychosocial risk Regulation and promotion of early intervention
7. Further support for Enforceable Undertakings (EUs) that can make a concrete difference to future health and safety, often much greater than through lengthy and expensive public prosecution
8. The increased use of infringement and expiation notices (or on-the-spot fines) as a cost-effective means of enforcement for less serious offences to increase SWSA leverage and improve overall WHS compliance
9. The desirability of providing for the option of a 'no-blame' safety investigation where the public interest in understanding causality and sharing lessons to avoid recurrence outweighs prosecution
10. In relation to WHS family assistance and transparency arrangements, consideration of better practice by members of ICAO, the international civil aviation regulator, after a fatal aviation accident
11. Government funding of the above priorities or funding through RTWSA, greater SWSA input for use of EU and expiation notice revenue, and cost recovery for SWSA safety investigation if not pursuing compliance action.

## Introduction

The Australian Institute of Health and Safety (AIHS) has a more than 70 year history as a professional member-based OHS/WHS association and is proud to have the Governor-General of Australia as Patron. In addition to WHS practitioners and professionals in a wide variety of workplaces and consultancies, our membership includes academics and researchers in disciplines such as safety science, ergonomics and occupational hygiene, and WHS lawyers. We contribute actively to the development of standards through Standards Australia. The AIHS has about 4,000 members nationally but more than triple that who receive our regular online material. AIHS is affiliated with the International Network of Safety and Health Professional Organisations (INSHPO).

The AIHS and its SA Branch notes that on most indicators published by Safe Work Australia (SWA), SafeWork SA (SWSA) is around the national average or the middle of its jurisdictional peers (see: <https://www.safeworkaustralia.gov.au/resources-and-publications/statistical-reports/key-work-health-and-safety-statistics-australia-2021> and the 2022 report expected soon). We consider that SWSA has made major improvements since the negative inquiry results in 2017 and 2018, particularly in compliance and enforcement investigation and briefs of evidence and has helpfully shared its better practice with WHS and other regulators around Australia, especially through Martyn Campbell as Chair of the Heads of Workplace Safety Authorities (HWSA). SWSA has encouraged strong relationships with AIHS and among academic researchers and experts, including Memoranda of Understanding in the area of hazardous materials.

The focus of our submission is on what additional changes may lead to even better regulatory practice and outcomes to increase the credibility of SWSA as a regulator, with industry, unions and the public. This requires an appropriate balance between proactive and reactive activities and being resourced to deal with shorter and longer term WHS hazards and issues. The AIHS continues to support the harmonisation goals of the 2008 COAG OHS Intergovernmental Agreement and seeks additional uniformity in WHS legislation, regulation and regulatory activity. With WA now among WHS jurisdictions, we continue to hope that Victoria will join the rest of the nation. However, there are also differences among WHS jurisdictions that should be minimised, and consistency in Industrial Manslaughter legislation and arrangements is a particular area in which SA, as part of addressing this after most other jurisdictions, can help encourage uniformity.

While additional policy can be found on the AIHS website (see: <https://www.aihs.org.au/aihs-policy>), the AIHS submits 11 priorities for consideration by the Independent Reviewer in relation to SWSA.

### ***1. The need for proactive SWSA enforcement of officer due diligence requirements, especially for boards/senior management of high-risk bodies, but more broadly using poor practice examples***

One of the important innovations in the model WHS Act as adopted in South Australia is to add to general 'reasonably practicable' duties of care of a Person Conducting a Business or Undertaking (PCBU) duties of officers (board members and senior management) including due diligence responsibilities in section 27.

Mark Murrie the father of a workplace fatality victim Luke Murrie stated to a WA Parliamentary inquiry into the 'Work Health and Safety Bill 2019' that introducing Industrial Manslaughter laws with greater fines would provide a bigger deterrent and compared it to increasing the fines for using a mobile phone whilst driving (see the 21:00 to 23:30 minute mark of the recording of this particular session of the inquiry: <http://203.26.91.200/lc%20archive/lcco%202020/20200708%20-%2001.00%20pm.mp4>).

Whilst the introduction of the Industrial Manslaughter legislation in most states of Australia has been done under the premise that it will provide a greater deterrent for PCBUs and the officers of organisations, we are

aware of no research evidence that supports this. A potential reason for this is the relatively small number of organisations and officers that are prosecuted for a breach of the WHS Act/Regulations, when compared with the number of infringement notices that are issued for using a phone whilst driving. In 2019 WA police issued almost 12,000 infringement notices for using a mobile phone whilst driving, whereas WorkSafe WA only had 5 successful prosecutions in that year.

This means that very few people personally know someone that has been prosecuted for a breach of the WHS Act/Regulations and therefore think it is only the 'cowboy' organisations and their officers that will ever be prosecuted. There are inevitably many breaches of the WHS Act/Regulations that occur every day, akin to using a mobile phone whilst driving. In organisations such as universities, the involvement of the SWSA inspectors has been essentially reactive, despite the vulnerability of students undertaking projects in hazardous environments such as laboratories, farms and engineering workshops.

Therefore, prosecuting a small number of officers under any Industrial Manslaughter Legislation is unlikely to change the behaviour of other officers when making decisions about whether to invest in newer plant to allow work to be conducted more safely or how much to invest in auditing and inspecting workplaces to ensure that their WHS Management Systems are in place and controls are effective. Industrial Manslaughter prosecutions are completely reactive and do not bring back the deceased workers. It can be almost abhorrent to invest so much money in conducting a reactive prosecution, when the same investment isn't being made to proactively change the behaviour of Officers before serious injuries or fatalities occur.

Accordingly, it is submitted that some of the SWSA's enforcement activity needs to be focussed on the proactive enforcement of the officers WHS due diligence obligations via random workplace inspections even where there has not been an injury, fatality or dangerous occurrence. The 2020 Independent Review of NSW WHS Resources legislation made a similar recommendation (number 37 at pp112-3:

<https://www.resourcesregulator.nsw.gov.au/sites/default/files/documents/whs-mines-and-petroleum-sites-act-and-regulation-statutory-review-report-october-2020.pdf>).

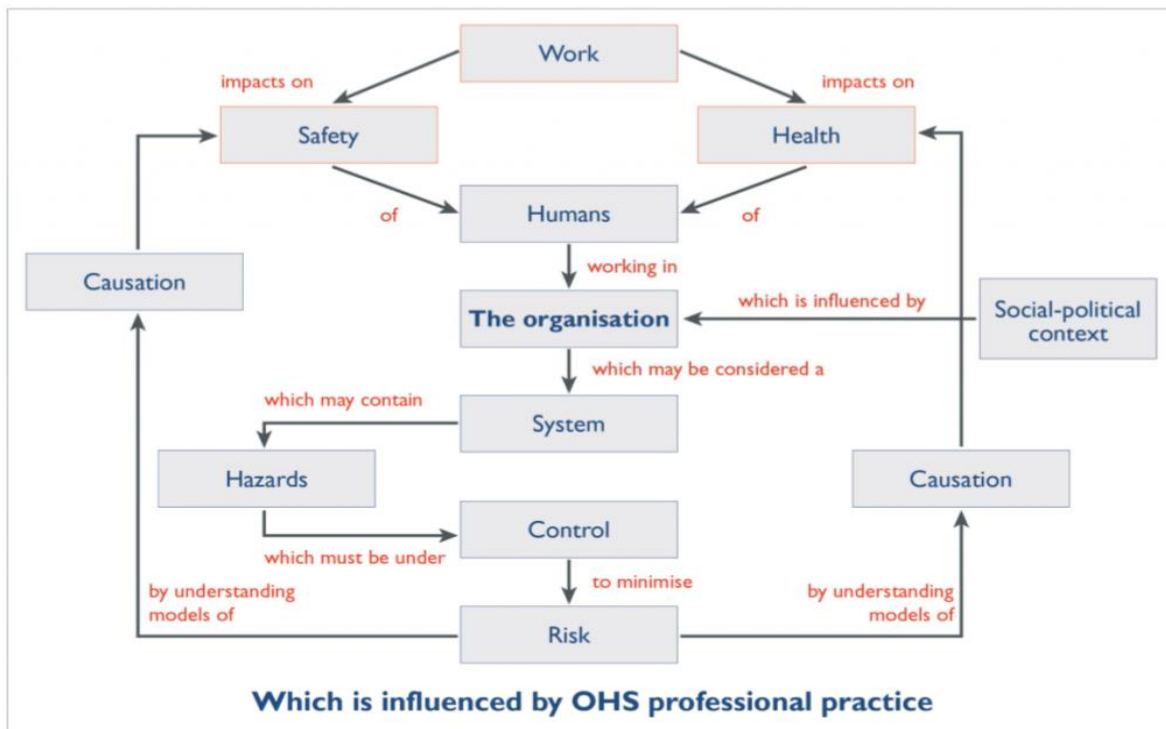
Beginning with the UK HSE, the offshore oil and gas industry has also placed a priority on health, safety and hazard training for boards and senior executives that could be adapted more broadly for other industries.

## ***2. SWSA encouragement, ideally in Regulation, of increased professionalism and competency among WHS practitioners and professionals with potential penalties for those who offer seriously incompetent advice***

The AIHS has since 2012 published an extensive free on-line resource called the OHS Body of Knowledge (BoK) that is used in tertiary curricula around Australia and internationally referenced (see: <https://www.ohsbok.org.au/>).

The conceptual framework of the BoK, summarised in the diagram below, is that:

- Work impacts on the safety and health of humans who work in organisations
- Organisations are influenced by their socio-political context and may be considered a system which may contain hazards that must be under control to minimise risk
- This can be achieved by understanding models of causation for safety and for health which will result in improvement in safety and health of people at work
- Professional OHS practitioners actively influence organisations to bring this about.



Drawing from the BoK and international best practice developed with the assistance of the AIHS by the International Network of Safety and Health Professional Organisations (see: <https://www.inshpo.org/work>), the AIHS supports and facilitates certification of WHS practitioners and professionals and continuing professional development (CPD) to build and maintain competency and also has a strong mentoring program (see: <https://www.aihs.org.au/certification> ).

Legislation in Victoria (suitably qualified professionals in OHS Act Section 22(2)(b)) and Western Australia (WHS Act Section 26A(3)) encourages professional OHS/WHS competence. There and around the world, this can take the form of encouraging certification or penalising those who offer WHS advice that is not competent and leads to serious adverse outcomes or both. SA should consider doing likewise.

As a point of comparison, the training requirements in Spain for those who provide higher level OHS 'prevention services' which are mandatory for prescribed organisations, are much more prescriptive and onerous compared with current AIHS Certification requirements, including a university degree and an additional 600 hours of training required (see: <https://www-boe-es.translate.googleusercontent.com/act.php?id=BOE-A-1997-1853& x tr sl=es& x tr tl=en& x tr hl=en& x tr pto=sc> ).

Support for well-trained Health and Safety Representatives (HSRs) and quality OHS education (university and TAFE/VET) is also important in improving WHS outcomes.

### **3. Developing a balance for longer- and shorter-term hazards using appropriate in-house and external expertise, e.g., carcinogens, silicosis, psychological injury and body stressing can be longer term**

The limitations of existing administrative datasets, notably workers compensation data, for understanding and managing occupational disease are well known. No national targets for occupational disease have been set other than for musculoskeletal disorders, and so progress in this area has been stymied. Asbestos-related disease, although important is now predominantly an issue from legacy exposures. In 2020, the University of Adelaide suggested to SWSA and RTWSA the linking of WHS-related data with medical-related data in the SA NT DataLink system but this was not progressed. Data linkage is a potentially powerful means of addressing occupational diseases of long latency, such as cancer.

In South Australia, expertise in SWSA for investigating “things that kill workers slowly” has been very limited (except for asbestos). SWSA inspectors do not have the capability to measure chemical exposures, and it is not clear whether inspectors have the ability to critically assess the adequacy of occupational hygiene or ergonomics reports by consultants. To our knowledge, no current SWSA staff are certified occupational hygienists or ergonomists. Over the last 20 years, the University of Adelaide has provided occupational hygiene support, via the Adelaide Exposure Science and Health Laboratory, particularly in the areas of dusts and chemicals. However, the lease on the AESH Laboratory at Thebarton runs out in late 2023. The future of such support to SWSA into the future is not guaranteed. Other states have in-house expertise or inter-agency support. Whilst it is encouraging to see SWSA’s new emphasis on psychosocial hazards, SWSA should build more capability in dealing with traditional health hazards such as toxic chemicals, dusts, noise and heat. This could be done as a joint partnership with the University of Adelaide, perhaps co-locating the AESH Laboratory with SWSA, and creating a centre of expertise and applied research.

On a positive note, the track record of SWSA in collaborating with the SA universities has been excellent.

SWSA has a MOU with the SA Metropolitan Fire Services, the SA EPA, the University of Adelaide and the Commissioner for Consumer Affairs in the area of hazardous materials. This MOU between University and Government has enabled greater information sharing, student placements and projects. e.g. improvement of the Help Centre webportal, and secondary analysis of databases. An example of this is: What Can We Learn about Workplace Heat Stress Management from a Safety Regulator Complaints Database? (co-authored by SWSA in 2018): <https://www.mdpi.com/1660-4601/15/3/459>. This is consistent with the views espoused by the National Regulators Community of Practice in “Complain, complain, complain: how complaints can (and should) change regulatory practice”:  
<https://www.youtube.com/watch?v=KsqE00A415E>

SWSA has been an active participant in collaborative WHS research. Two key areas are mentioned.

#### Heat and Work Injury

This engagement has resulted in numerous publications, and has advanced [safety science](#) at the international level. SWSA is a partner in the [Heat and Health Adaptation team](#), which was a finalist in the 2022 Eureka Prize for Interdisciplinary Research. This underscores the deep contributions that SWSA is making to basic and applied safety science – something that is unique amongst WHS regulators.

#### Engineered stone – exposure science

The University of Adelaide, in partnership with SWSA and MAQOHSC has published a series of papers relating to engineered stone dust. The collaboration between SWSA and the University of Adelaide has generated 4 international peer-reviewed publications to date, and stimulated the Australian Institute of Occupational Hygienists to prepare a detailed evidence-based submission to the NSW Dust Disease inquiry and the SWA CRIS, plus a peer-reviewed journal article: <https://academic.oup.com/annweh/advance-article/doi/10.1093/annweh/wxac064/6701828> This has enhanced our understanding of what is important to reduce exposures and risks of silicosis and other silica-related diseases.

It is important that SWSA has sufficient in-house capability and reliable access to external expertise to understand and prioritise action on longer-term WHS hazards.

#### ***4. Establishment of a peak Ministerial advisory body including WHS experts (and an independent chair) replacing the WHS functions of the current Industrial Relations Consultative Council***

The South Australian WHS policymaking arrangements are exclusively tripartite. The current Industrial Relations Consultative Council advising the Minister only meets twice per year and has a broad remit that does not adequately address WHS: “The IRCC is an advisory body responsible for assisting the Minister in formulating policies on industrial relations, employment and work health and safety (WHS) in the State, as well as advising the Minister on any legislative proposals of industrial or WHS significance.”

We argue that a separate advisory board, commission or committee should address WHS, with wider representation including WHS experts, as is the situation in jurisdictions such as WA and QLD. An independent chair could help facilitate its operation as occurs with NSW Resources WHS. The WA WHS Commission includes three independent WHS experts, representing the disciplines of medicine, hygiene and safety. They are active contributors providing timely advice from the latest research evidence, theoretical concepts and historical experience, engagement with University WHS education providers, international links and committees, professional practice etc. In the September 2022 WA WHS Commission Meeting Minutes there are eleven mentions from the experts.

The AIHS has been in contact with the Australian Institute of Occupational Hygienists and they endorse this Recommendation, suggesting that the WA model of WHS experts on peak WHS consultative committees should be adopted in all jurisdictions. We suggest that the Reviewer discuss the WA arrangement with the Worksafe WA Commissioner, Darren Kavanagh, to independently gain an insight into the value added.

#### ***5. Ensuring that SWSA is well placed to address the emphases in the imminent new national WHS strategy and emerging issues such as climate change and WHS, insecure work, harassment, and new technology such as automation, robotics and augmented/virtual reality***

The pace of technological and workplace change has accelerated and shows no sign of slowing in the future. It is now even more important that a national WHS framework Act with general duties and due diligence is broad enough to cover outsourced and other working arrangements such as in the gig economy, and workforce diversity including gender, age, culture, language, religion, numeracy and literacy. There remains a need for prescriptive regulation in areas where safety evidence is clear, such as with machine guarding, dust diseases, methane in coal mines, electrical safety, chemicals, transmission of dangerous viruses, and so forth. But much more detail on hazards with lesser risk can be provided in Codes (that have evidential value if followed and an accident occurs) and non-statutory guidance material as recommended by Robens.

There has been an emphasis on the physical hazards arising from the introduction of new technologies such as collaborative and remotely operated robots, augmented reality and virtual reality, but significantly less emphasis and recognition of the fundamental changes in work design that new technologies will bring. Consultation and worker involvement will be critical in the successful adoption of new technologies and in mitigating physical and psychosocial risks. Inspectors will also require upskilling in being able to translate existing legislation to this emerging context.

In relation to human and organisational factors and ergonomics, we emphasise the need for ongoing attention to the above issues as well as the perennial risks and injury incidence from hazardous manual tasks across industries (noting the ongoing effort of SWSA towards proactive compliance campaigns in specific sectors) and support this as an area of interest in terms of Initiatives and Relationships with SWSA. The inclusion of the psychosocial risk management provisions is timely in establishing a foundation in WHS legislation for the management of risks from emerging and advanced technologies.

Given the community (and G20 leaders) concerns about climate change, there is an opportunity for SWSA to lead Australian regulators in the area of climate change and WHS. A NHMRC Centre of Research Excellence in Climate Change and WHS led by the University of Adelaide, has been proposed with a submission to be made by December 2022.

#### **6. Full adoption of the 2022 WHS psychosocial risk Regulation and promotion of early intervention**

An important and long overdue inclusion in the SA WHS Act 2012 was the specific reference to psychological health in the meaning of health and safety. Finally, some ten years later the need for specific requirements in meeting the duty of care for management of psychosocial hazards has been recognised by inclusion of psychosocial risk management in the Model WHS Regulations, 2022 (at Division 11). The AIHS has long endorsed the need for specific provisions (beyond the narrow scope of bullying and harassment) for the protection of psychological health (most recently, see:

<https://www.aihs.org.au/sites/default/files/PS%20AIHS%20Psychological%20Health%20and%20Safety%20at%20Work.pdf> ). The AIHS endorses the use of the term ‘psychosocial’ to give emphasis to the social context

of work and the role of interactions between people, tasks and environments in the manifestation of psychological harm and injury. Action by the Victorian and NSW jurisdictions to proactively adopt more specific regulation sets a precedent to adoption in SA and AIHS urges SafeWork SA to adopt the regulations in full, while also promoting an integrated approach to prevention, early intervention, and supporting individuals experiencing a psychological injury to recover and return to work. The emphasis needs to be on senior management commitment and the design of work, including provision of resources and early intervention (with use of officer due diligence provisions as stated in point 1 providing an additional means of enforcement). Inspector training supported by clear compliance and enforcement processes are essential for successful implementation. Current research identifies several tools and models are available to support risk assessment and monitor risk levels, including establishing benchmarks (e.g. Psychosocial Safety Climate).

#### **7. Further support for Enforceable Undertakings that can make a concrete difference to future health and safety, often much greater than through lengthy and expensive public prosecution**

The OHS Body of Knowledge outlined at point 2 above was initially supported by WorkSafe Victoria for 2012 release and Safe Work Australia supported development of four new chapters in 2013-14. The BoK continues to be supported by the AIHS which employs a BoK Manager and provides administration and web services using membership revenue. However, Enforceable Undertaking revenue and other corporate support is necessary to update chapters and produce new ones (see: <https://www.ohsbok.org.au/enforceable-undertaking/>). SafeWork SA has been supportive of the use of EUs as a means to improve future WHS rather than just penalise in relation to a past event and we hope your review will encourage this to continue and, where appropriate, expand.

#### **8. The increased use of infringement, penalty and expiation notices (or on-the-spot fines) as a cost-effective means of enforcement for less serious offences to improve overall WHS compliance**

The ability for SWSA to issue a broader range of infringement notices for certain breaches of the WHS legislation could be added to the menu of penalties at their disposal. SWSA already uses expiation notices (see: <https://www.safework.sa.gov.au/enforcement/penalties#Expiation>) but a broader range of infringement notices are used in other WHS jurisdictions that can be examined for suitability. In 2021 the Victorian Government introduced range of ‘on-the-spot’ infringement notices for WorkSafe Victoria (see: <https://www.worksafe.vic.gov.au/infringement-notices-scheme>). Infringement notices allow SWSA to issue a financial penalty for low level breaches that would have a greater deterrent effect than a Prohibition, Improvement, or Provisional Improvement notice alone (which may be seen merely as a “slap of wrist”), without having to go through a costly prosecution process to do so. They can be a much more cost-effective

way to enforce low level breaches of the WHS Act/Regulations. Issuing infringement notices to Officers (see point 1 above) that have not identified the risks in their organisations (i.e. WHS Act Section 27 (5) (b)) or have not verified that the use of resources to control those risks (i.e. WHS Act Section 27 (5) (f)), is more likely to quickly and proactively change Officers behaviour, before a serious injury or fatality occurs.

***9. The desirability of providing for the option of a ‘no-blame’ safety investigation where the public interest in understanding causality and sharing lessons to avoid recurrence outweighs prosecution***

The AIHS considers that while SWSA has made major improvements in compliance and enforcement investigation in recent years, there is an opportunity to add the option of a ‘no-blame’ safety investigation when the public interest in understanding causality and sharing lessons to avoid recurrence, particularly in high-risk industries, outweighs the merits of potential prosecution and associated lack of transparency issues associated with in-house legal professional privilege investigations.

The members of the International Transportation Safety Association (ITSA) are government ‘no-blame’ professional safety investigation authorities and include the Australian Transportation Safety Bureau (ATSB) and the US National Transportation Safety Board (NTSB). Following the lead of civil aviation through ICAO Annex 13 regulatory/criminal/civil law ‘blame and liability’ accident and serious incident investigations are conducted separately from safety (see from page 6 at:

[https://bea.aero/fileadmin/documents/Cadre\\_juridique/Recueil\\_textes\\_reglementaires\\_ANG\\_2021\\_01\\_14.pdf](https://bea.aero/fileadmin/documents/Cadre_juridique/Recueil_textes_reglementaires_ANG_2021_01_14.pdf))

In Australia, other than aviation, marine and rail transport (and potentially heavy road vehicles soon), there is no independent standing investigatory body. The NSW Resources Regulator operating under enhanced WHS legislation conducts separate safety investigations aimed at preventing recurrence of similar accidents and serious occurrences. If it nominates to do this, it undertakes not to take separate compliance/enforcement action. We believe this is worthy of inclusion as an option for SafeWork SA.

In 2020, Kym Bills as independent reviewer for the NSW WHS resources legislation and regulation recommended enhancements to investigation and improved uniformity and sharing with other WHS regulators including SA, see recommendations 4, 6 and 7 and especially pages 46-48 and 56-58 in:

<https://www.resourcesregulator.nsw.gov.au/sites/default/files/documents/whs-mines-and-petroleum-sites-act-and-regulation-statutory-review-report-october-2020.pdf>

***10. In relation to WHS family assistance and transparency arrangements, consideration of better practice by members of ICAO, the international civil aviation regulator, after a fatal aviation accident***

There is a good deal that can be learned from better practice family assistance and transparency arrangements, particularly after a fatal aviation accident, as can be seen in the following sources:

ICAO. 2013. Manual on Assistance to Aircraft Accident Victims and their Families. Doc 9973. 1<sup>st</sup> edition. International Civil Aviation Organization, Montréal.

[https://www.icao.int/Meetings/a38/Documents/DOC9998\\_en.pdf](https://www.icao.int/Meetings/a38/Documents/DOC9998_en.pdf)

ATSB. 2013. Information for families and friends as the next of kin. Australian Transport Safety Bureau, Canberra. <https://www.atsb.gov.au/media/4787672/Next%20of%20Kin%20booklet.pdf>

NTSB. n.d. Family Assistance. National Transportation Safety Board, Washington, D.C.

<https://www.nts.gov/tda/Pages/default.aspx>

TSB. 2020. Policy on the dissemination of information to families, loved ones and survivors. Transportation Safety Board of Canada (TSB), Ottawa. <https://www.bst-tsb.gc.ca/eng/lois-acts/diffusion-dissemination.html>



**11. Government funding of the above priorities or funding through RTWSA, greater SWSA input for use of EU and infringement notice revenue, and cost recovery for SWSA safety investigation if not pursuing compliance action.**

The expectations of government have led to a range of new responsibilities for SWSA but its funding has not increased commensurately. The priorities identified above will add to the imperative for increased funding. However, Enforceable Undertaking and infringement notice revenue can potentially assist meeting SWSA's WHS objectives. No-blame safety investigations could also potentially be cost recovered. Health and safety professionals seek systemic approaches to WHS issues that involve defining the relevant system boundaries and addressing its interlinked causal aspects. We consider that funding a more proactive and expert approach to prevention of injuries and disease through SWSA is likely to substantially reduce workers compensation and insurance costs and improve the quality of work. This would lead to significant longer-term savings by ReturnToWork SA (RTWSA) and increased workforce productivity. If RTWSA and SWSA are considered together, additional funding for SWSA could be addressed through RTWSA. SWSA would become a more credible regulator with greater public visibility.

We note that the Health and Safety Executive in the UK, have a program called 'Discovering Safety' <https://www.discoveringsafety.com/> which has been funded by the Lloyd's Register Foundation to the amount of £10 million. Part of the program involves use of an automatic redaction tool that can be applied to their data, including RIDDOR ([Reporting of Injuries, Diseases & Dangerous Occurrences](#)) Report, Improvement and Prohibition Notices, Notifications of Contravention, IMPACT and INVPROSREP reports. They are creating a data warehouse of not only their redacted data, but that of other organisations that are willing to provide it that can be utilised by researchers and other organisations to provide insights as to how workplace risks can be more effectively managed. SWSA providing their data to be redacted and added to this data warehouse and utilising this broader data set would leverage data for better regulation at low cost and when conducting research provide insights to inform the development of workplace risk management. SWSA might also wish to encourage SWA to contribute Australia-wide data to help support new nationally consistent WHS Regulation, Codes of Practice and Guidelines.

## Conclusion

We are grateful to have met with you on 18 October with our colleagues Dr Valerie O'Keeffe and Nathan Winter and for the opportunity to make this submission. After the annual SA WHS Symposium on 21 October with Minister Maher as a keynote speaker and around ten SWSA officers as attendees (see: <https://www.aihs.org.au/events/south-australian-2022-safety-symposium-0>) Kym Bills will be overseas until 8 November. For additional input or clarification please feel free to contact Dino Pisaniello: E: [cofchair@aihs.org.au](mailto:cofchair@aihs.org.au) or M: 0417 876 077.



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