



Child Development Council
GPO Box 1152
ADELAIDE SA 5001

Via email to ChildrenSA@sa.gov.au

Submission to: Child Development Council on the First Review of South Australia’s Outcomes Framework for Children and Young People

The Australian Institute of Health and Safety (AIHS) welcomes the opportunity to provide a submission into the First Review of South Australia’s Outcomes Framework for Children and Young People.

We believe the work of the Council is commendable, and we support the initiatives undertaken thus far.

About us

The AIHS is the peak body for work health and safety (WHS) professionals and practitioners across Australia. We have more than 4,000 individual members, more than 200 of which are based in South Australia (SA). Formerly the Safety Institute of Australia, since 1947 we have represented the WHS profession with courage on policy matters. Our vision is for healthy and safe workers in productive workplaces. You can learn more about us at www.aihs.org.au.

Key points:

- Young people will become increasingly important to SA’s labour market as the population ages
- Young workers are at proportionally greater risk to workplace injuries, due to power relationship dynamics, relative inexperience, and a range of other factors
- Measuring WHS outcomes is complex
- WHS datasets may be available through collaboration with WHS agencies such as SafeWork SA, ReturnToWorkSA, and Safe Work Australia
- Incorporating these datasets would improve the Framework, so as to ensure the harmful impacts on young people’s health and safety incurred through work are appropriately captured and reported.

Our submission

Our submission focuses primarily on Safety Indicator 2 in the Framework, *‘Children and young people are safe from preventable injury’*, specifically in relation to the measures of:

- *'number of children and young people presenting to emergency departments with potentially preventable hospitalisations'* and
- *'number of deaths of children and young people being attribute to preventable/unintentional injury'*.

Like the rest of the country, SA's population is ageing. Young people will play an increasingly important role in the State's labour market. In the skilled labour context, apprenticeships and trades are becoming increasingly valuable to society. We want more young people to be supported to be able to seek and find meaningful, safe and rewarding employment.

We know that nationally both younger and older people are over-represented in WHS injury statistics but typically for different reasons. 2019-20 statistics from Safe Work Australia, the nation's WHS policy and statistics agency, indicate that workers under the age of 20 experienced a frequency rate (serious claims per million hours worked) of 6.9, which is the highest of any age cohort up until the age of 50. Within this 6.9 figure, males were over-represented (8.9) compared with females (4.4). Most of these claims were injury-related as opposed to disease. This is due to many occupational diseases having long latency periods of many years.

The under-20 cohort experienced a lower incidence rate (serious claims per thousand employees), because each individual young worker typically does less than full time hours, meaning there are more workers per incident¹ compared with other age cohorts. For example, South Australian young people 17 years of age reported working between 12-14 hours per week in their main job².

In SA during the period 2014-17, young workers accounted for 16% of all worker injuries. The most common injuries were lacerations, soft tissue injuries, bruising, foreign objects in eyes/ears/nose, and fractures³.

Other WHS regulators across Australia have also identified this issue, and subsequently provided online supporting resources. This included the Northern Territory⁴, Queensland⁵, NSW⁶, Western Australia⁷, and Victoria⁸.

Young workers are at greater risk for a variety of reasons, including them being less likely to be confident/willing/supported to speak up and raise WHS issues in their workplace, as well as obviously being less experienced. Our position on this is that those claiming to identify and define causes must be cautious; young people (like all people) are complex, and there are many inter-relating factors at play. We encourage WHS stakeholders, including regulators and researchers, to not over-simplify motivations or outcomes with statements such as 'young people lack confidence'.

¹ <https://www.safeworkaustralia.gov.au/resources-and-publications/statistical-reports/key-work-health-and-safety-statistics-australia-2021>

² Pg. 70 at <https://childrensa.sa.gov.au/wp-content/uploads/2021/12/How-are-they-faring-SAs-2021-Report-Card-FINAL-2021-12-22.pdf>

³ <https://www.safework.sa.gov.au/workers/types-of-workers/young-workers>

⁴ <https://worksafe.nt.gov.au/safety-and-prevention/youth-worker-program>

⁵ <https://www.worksafe.qld.gov.au/safety-and-prevention/hazards/workplace-hazards/young-workers>

⁶ <https://www.safework.nsw.gov.au/resource-library/at-risk-workers/young-workers-toolkit>

⁷ <https://www.commerce.wa.gov.au/worksafe/safety-tips-new-and-young-workers-and-their-employers>

⁸ <https://www.worksafe.vic.gov.au/young-workers>

Of the approximately 200,000 10-19 year old South Australians⁹, it is difficult to know how many of them undertake paid employment. This is particularly the case given many young people work in exchange for ‘cash in hand’ in informal working arrangements. We note that these measurement difficulties are captured in the Council’s 2021 update report¹⁰.

Currently there is no minimum working age in SA¹¹. Young people are often at a disadvantage in terms of structural power relationships and are therefore at greater risk of exploitation and being placed in unhealthy or unsafe working environments. In Victoria, a high-profile example of this risk was the bullying and suicide case of Brodie Panlock¹². Sadly, there are many other instances where abuse of this power dynamic occurs¹³.

It is vital that South Australian duty holders meet their WHS obligations as required under South Australia’s WHS Act (2012)¹⁴, and that young people are provided safe workplaces that aren’t detrimental to their health and safety.

We believe that young people working in informal arrangements are less likely to lodge compensation claims and/or notify the regulator of notifiable incidents. There is therefore a risk that the physical and psychological hazards faced by young workers at their workplaces is invisible to policymakers, regulators, and the broader community.

There were nine deaths of 10-19 year old children and young people in SA between 2017-20 coded as ‘accidents’ by the SA Child Death and Serious Injury Review Committee (CDSIRC). The definition used by CDSIRC under their methodology does not explicitly refer to deaths in a workplace context: *“Accidents exclude deaths attributed to transport incidents, fires or drowning. Also referred to as deaths from unintentional injuries, these deaths most commonly include accidental: suffocation, strangulation and choking, falls, and poisoning.”*¹⁵

Arguably, under the current Framework, the physical and psychological impacts of work on young people are not being captured or at last seriously under-reported.

We know that the datasets supporting the two measures mentioned above are framed through predominantly non-work, public health lenses¹⁶. Specifically, SA Health, the Children’s Headline Indicators dataset from the Australian Institute of Health and Welfare (AIHW), and the CDSIRC appear to be the main sources.

⁹<https://www.abs.gov.au/census/find-census-data/quickstats/2016/4#:~:text=In%20South%20Australia%2C%20of%20people%20aged%2015%20years,term%20illness%20or%20problems%20related%20to%20old%20age>.

¹⁰ Pg. 34 at <https://childrensa.sa.gov.au/wp-content/uploads/2021/12/How-are-they-faring-SAs-2021-Report-Card-FINAL-2021-12-22.pdf>

¹¹ <https://safework.sa.gov.au/workers/wages-and-conditions/minimum-working-age>

¹² <https://www.justice.vic.gov.au/saynotobullying>

¹³ <https://www.news.com.au/lifestyle/real-life/news-life/adelaide-teen-assaulted-after-rejecting-200-offer-for-sex-with-boss/news-story/fb50d1876cf6810c4428d713a55019fa>

¹⁴ <https://www.legislation.sa.gov.au/lz?path=/c/a/work%20health%20and%20safety%20act%202012>

¹⁵ Table 2 at <https://cdsirc.sa.gov.au/annual-report-2020-21/Chapter-3.html#3.0>

¹⁶ Pp. 41-42 in <https://childrensa.sa.gov.au/wp-content/uploads/2022/03/Outcomes-Framework-Data-Tech-Pub-Ed-2-FINAL-2022-03-10.pdf>

We urge the Council to consider incorporating work-based settings and associated datasets. Agencies such as SafeWork SA, ReturnToWorkSA¹⁷ and Safe Work Australia may be able to provide valuable statistical resources to ensure the work-based aspect of young people’s lives is appropriately captured and incorporated into the Outcomes Framework. These data may subsequently help provide insights that can be fed back to WHS stakeholders and help improve duty holders’ risk mitigation strategies.

By collaborating with those agencies carrying responsibility for WHS datasets, richer datasets can be used to tell a more complete picture of the health, safety, and wellbeing of young people, encompassing the informal and formal work they perform.

So which WHS measurement to use?

At the organisational level, there are challenges in measuring and reporting on WHS outcomes. Contemporary and valuable resources on this topic are led by the work of Dr Sharron O’Neill¹⁸. Measuring WHS outcomes is complex because people are complex.

We therefore suggest investigating collaboration opportunities with SafeWork SA and/or ReturnToWorkSA (and with Safe Work Australia via SafeWork SA). For example, currently notifiers’ age or date of birth data are not collected when people notify the regulator of workplace injuries¹⁹.

Summary

Healthy and safe work provides psychological, emotional and physical benefits to workers of all ages, including young people. Work provides for social connections, education on topics such as commerce and business, and can enable economic empowerment and agency. Indeed, healthy and safe work can act as a key enabler for young people to achieve many of the elements in the SA Children and Young People Charter.

We hope that this submission assists the Council to reflect upon how the Outcomes Framework and reporting can be further improved in relation to the Safety dimension. One of the key objectives of the framework is to enable the provision of *“evidence for decision-making for policy and other interventions to improve the lives of all children and young people”*. We trust that this submission has provided some useful context and direction into how the lives of young workers in SA may be improved through evidence-based policy measures.

¹⁷<https://public.tableau.com/app/profile/rtwsa/viz/ReturnToWorkSA-InsurerStatisticsFY2021/ReturnToWorkSA-InsurerStatisticsFY2021>

¹⁸<https://research.unsw.edu.au/people/associate-professor-sharron-oneill/publications?type=reports>

¹⁹<https://www.safework.sa.gov.au/notify/workplace-incident-notifications>

For more information about this submission please contact me at policy@aihs.org.au.

Yours sincerely,



Andrew Heinrichs

AIHS Policy Committee Chair



Kym Bills

SA AIHS Branch Committee Chair