



HEALTH AND SAFETY
LOOKING BACK, **THINKING FORWARD**

The Australian Work Health and Safety Strategy
Summary Report
December 2021

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Background and Purpose

The health and safety - looking back and thinking forward report has been prepared by the Australian Institute of Health & Safety (the Institute) to inform the Australian Work Health and Safety Strategy 2012-2022 (AWHSS) review.

The Institute is the national association for health and safety professionals. It provides evidence-based policy, advocacy, and standards work and a wide range of professional development and career learning support for health and safety professionals and practitioners. It is the core curriculum resource steward for tertiary health and safety professional courses (the OHS Body of Knowledge) and auspices the Australian OHS Education Accreditation Board.

We engage with over twenty thousand work health and safety (WHS) professionals, practitioners, educators and researchers who advise Australian and international organisations, regulators and governments.

To inform our report, we 'looked back and abroad' to consider what has been achieved and then we 'looked forward' to what the profession believes must occur over the next decade to achieve healthy, safe and productive working lives for every Australian worker, wherever they work and whatever their employment arrangements.

The Institute:

- undertook a literature review of international, national WHS strategies,
- considered data and insights from a wide range of Australian and international WHS reports,
- surveyed WHS professionals and academics, and
- undertook targeted interviews with AIHS fellows, leading WHS professionals and academics.

These processes considered the current and future AWHSS purpose, target audiences, key stakeholders, desired outcomes, priorities, and action areas. We also sought comments on the implementation, evaluation and reporting of both the current and future document.

This report provides a summary of findings and recommendations. The full report will be released in early 2022.

What We Learnt



Generally, it was acknowledged that the AWHSS 2012-2022 development process was sound. The approach to co-design the document with key signatories based on available evidence, was informed by consultation with a wide range of WHS stakeholders including private and public sector employers, industry associations, unions and worker representatives, academics, educators and WHS professionals.

Overall, the AWHSS 2012-2022 content and structure was acknowledged by our stakeholders as appropriate for its time, and it was generally locally well received and internationally respected. The ten-year duration was regarded as being long enough to set more ambitious change goals (and bypass election cycle pressures), implement national infrastructure improvements and see real outcomes, whilst being short enough for stakeholders to work towards implementing actions under each priority and action area and measure their progress.

The stated AWHSS purpose was to drive key national activities to achieve improvements in WHS. It was aimed at regulators, industry, unions, other organisations and governments that in turn influence work and workplaces across Australia.

However, our stakeholders noted that endorsement of the document was very limited - just government representatives (essentially WHS regulators), Safe Work Australia, just two industry associations, and only one worker representative group (the Australian Council of Trade Unions). The WHS profession was not invited to endorse the document.



The AWHSS stated that the desired outcomes could only be achieved if there was an:

- appropriate WHS infrastructure (a responsive and effective regulatory framework, all parties with a role in WHS have appropriate knowledge and skills, and a robust evidence base), and
- duty holders and those who support them make concerted efforts to systematically reduce exposure to hazards and increase risk control quality.

The failure to explicitly engage a more comprehensive and representative range of key signatories in the implementation was viewed as a significant lost opportunity which could have driven other stakeholder engagement. This included:

- business associations and unions, especially those representing priority industries and emerging high-risk sectors such as renewable energies and gig/digital work platforms
- other regulators who share an interest and responsibility for WHS, including radiation and nuclear safety, rail, mining, and maritime industries
- government agencies supporting the creation of an adequate Australian WHS infrastructure (e.g., those funding or delivering WHS research or tertiary and vocational education)
- the WHS profession which provides strategic and operational WHS advice to organisations and governments, and whose professional associations are directly involved in the widespread establishment and delivery of significant amounts of OHS infrastructure directly relevant to the AWHSS and its success
- other non-government and community organisations who have a stake in WHS outcomes.

This failure to capture widespread stakeholder engagement runs through the implementation over the ten-year period of the Strategy. Indeed, most WHS professionals interviewed believed that the AWHSS was not relevant to them and was only helpful to guide the work of regulators and governments. This belief probably reflects the reality of how the Strategy has been in practice implemented and communicated.



Targets and Performance Indicators

Three high-level targets were established to focus national attention and measure the success of the collective actions. These were:

- 20% reduction in worker fatalities
- 30% reduction in the incidence rate of claims resulting in one or more weeks off work, and
- 30% reduction in the incidence rate of claims for musculoskeletal disorders (MSDs).

There was a strong view from respondents that two injury-based targets and a single MSDs target were grossly inadequate, and by the second half of the AWHSS there should have been targets in at least some of the priority health conditions. As a result, proportionally greater attention remained on traumatic injury prevention. It has only been the last few years of the AWHSS (and only after significant media attention) that focus on health at work, including mental health conditions and lung diseases like silicosis, significantly increased.

Respondents were quite aware of the complex and circular problem. Without adequate investment in research and national datasets, it will continue to be challenging to justify investing limited resources on long-latency conditions or those where the attribution to work and estimation of economic burden is more complex.

Despite the original intention, the planned performance metrics, including measuring exposure to hazards, improvements in hazard controls, and the strategic outcomes under each action area, were not developed. As a result, it is impossible to accurately assess if the collective efforts of stakeholders were appropriately focused or achieved the desired reach and impact. In other words, we cannot know if the Strategy improved outcomes or not.

The national investment in data collection, research and evaluating WHS interventions waned over the duration of the Strategy. With the notable exception of SafeWork NSW and WorkSafe Victoria, signatories also have not funded significant research, despite the clear need for this to occur.



Many noted the new strategy needs to be more sophisticated and more actively leverage the work of a wider group of stakeholders, including collaborations with research funders such as the Australian Research Council, or custodians of national data like the Australian Institute of Health and Welfare and the Australian Bureau of Statistics.

The Institute considers it imperative that there is an appropriate national investment in research and program evaluation to collect critical data on hazard exposure, intervention effectiveness, harm prevalence and the human and economic costs in priority groups, and data analysis capability and capacity to adequately interpret and report this data.

It is likely to continue to be unrealistic and unacceptable to capture de-identified organisational level health and safety performance data to measure national progress. The People at Work Psychosocial Risk Assessment is a notable exception to this.

Respondents noted that despite materials produced by Safe Work Australia (such as the WHS measuring and reporting series by Associate Professor Sharron O'Neil) and others, most organisations continue to rely on lag indicators.

The Institute strongly recommends the next strategy include activities to promote organisations using performance metrics that are a more balanced mix of lead and lag indicators.

Recommendations

That the next AWHSS:

1. includes investment in national research and program evaluation and data analysis, sufficient to ensure AWHSS efforts are appropriately prioritised and able to be evaluated.
2. explicitly includes collaborations with key research funders and dataset custodians.
3. commits, where inadequate data currently exists to create national targets or meaningful performance metrics, to develop these in the first two years of the next AWHSS.
4. includes targets for traumatic fatalities and injuries and all priority conditions, and considers targets for priority hazards and industries.
5. includes clearly defined action area outcomes and measurable performance metrics.
6. promotes the use of appropriate organisation-level performance metrics.

Action Areas and Strategic Outcomes

The AWSS included six priority conditions, seven priority industries and seven action areas. Stakeholders felt that specifying clear (national) action areas, articulating their rationale, and including priority conditions and industries is a pragmatic approach, focusing limited stakeholder resources on the areas of greatest need and likely impact.

The first action area was health and safety by design which included the historical focus on the safe design of plant and structures, and a new one on the design of work. Generally, activities delivered as part of this action area were viewed as helping to 'change the WHS conversation' and increasing duty holder awareness of how the design of work, work arrangements, plant, new technologies and structures impact health, safety and business outcomes. Addressing this was seen to be central to achieving the elimination of hazards and effective and sustainable risk minimisation. Despite this widely accepted principle and requirement in the legislation, it was felt the national focus on this action area was patchy, and a much stronger focus on this important area is required in the future strategy.

The second action area, supply chains and networks recognised the need to consider the influential role of commercial decisions across often complex supply chains and entire product lifecycles. Our respondents felt too many duty holders were not aware or chose to ignore the WHS chain of responsibility. There remains a serious potential for poor or exploitative practices to negatively impact WHS in organisations within supply chains, especially small businesses.





Supply chains are increasingly complex, crossing national and indeed international borders. The growing use of labour-hire workers, often with poor industrial safety nets and WHS standards, is a deep concern. We cannot allow dual WHS standards for some Australian workers and lower standards for those in precarious arrangements. This raises the sensitive discussion of the inevitable intersection between industrial relations and WHS. While we acknowledge the challenges, an honest conversation on this intersection is required to inform the next strategy.

Unsurprisingly, Institute members, researchers, educators and general respondents had clear views of the importance of the health and safety capabilities action area. Respondents noted the range of resources and support for duty holders provided by regulators, industry associations and unions. The emerging focus on inspector capability and inspector training programs was noted, but the lack of national coordination and investment in this area were seen as missed opportunities.

At the operational level, more than thirty thousand professionals and practitioners across Australia have the functional ability to influence WHS performance within organisations. So, the quality of tertiary and vocational training, and the structures and systems which support their overall capability, are critical.



Australian Institute of Health and Safety
Looking back, thinking forward



There was widespread disappointment and dissatisfaction that the significant and critical efforts of academics, educators, WHS professionals, the AIHS (representing WHS generalists), and professional bodies representing hygienists and ergonomists, to support improved WHS capability have not been adequately acknowledged, supported, or resourced. These groups have continued to build a contemporary evidence-based system through research, through the OHS Body of Knowledge, the work of the OHS Education Accreditation Board, and the professional associations' Certification programs. These all make powerful contributions to defining 'suitably qualified' advice, ensuring that Australian employers can be more confident in the advice provided to them and their workers. However, these have had virtually no encouragement, funding, or any other support at all despite their critical importance to this priority area of the Strategy.

Respondents expressed strong concerns around the declining quality of vocational and workplace level training, and that this must be included as a stronger focus in a future document.

The critical role of leadership and organisational cultures (the fourth action area) to generate and sustain WHS has been recognised for decades and was reflected in the strategic activities. Our respondents felt that business leaders are slowly maturing and that the mix of persuasion, compliance support, and enforcement is working. For various reasons, government frameworks and legislative change lag behind innovative WHS practices implemented by leaders in large Australian or multinational companies. So, in the next strategy, we must tap into and showcase industry best practices.

Community expectations are growing that it is unacceptable that work might physically or psychologically harm workers. Conversely, Australian's also resist if they feel they are being over-regulated. The need to get the balance right, use behavioural insights to shape our messaging, and harness community influencers to help us change expectations must continue in the following strategy.





Observations on the fifth action area research and evaluation to generate evidence-informed policy, programs and practice has already been noted.

The sixth action area government recognised the critical role of governments as best practice employers, developing and implementing policy, and using their investment and purchasing power to improve WHS. Taken collectively, governments are the largest employers in Australia and should be exemplars. While many government agencies across Australia appear to be taking seriously the need to improve the health and safety of their workers, our respondents were of the view that too many do not.

There was a general view there was only a superficial commitment by governments to consider how federal, state and territory policy and programs impact the health and safety of their own workers and those delivering products and services for them. Australians expect that governments will use taxpayers' funds effectively and ethically.

Respondents noted that Safe Work Australia members' efforts over the last ten years appear to have been mainly on the seventh action area - creating a responsive and effective regulatory framework – which reflects their own major focus but at some cost to the other, equally important priority areas of the Strategy. We agree that national and jurisdictional activities to amend legislation and develop codes and guidance are (a) essential to provide clarity and practical guidance to duty holders, and (b) essential to support the harmonisation process. However despite the focus we feel there was not enough work done on national guidance and codes.

Respondents believe that the Strategy represents an opportunity to focus on the economic benefits of good health and safety, demonstrating the economic links between healthy and safe work and long-term organisational sustainability and efficiency, presenting WHS as an opportunity for safe profitable and efficient operations rather than an inconvenient burden and cost. The new strategy should include activities demonstrating to duty holders the links between WHS and organisational sustainability.



Recommendations

That the next AWHSS:

7. increase the focus and activities to support on good design of work, plant and structures.
8. increase the focus on supply chain commercial arrangements and relationships to influence chain of WHS responsibilities.
9. ensures that the intersection between industrial relations and WHS is considered and appropriate activities included.
10. continues the focus on organisational leaders creating positive workplace cultures that support health and safety and workers to thrive.
11. uses behavioural insights from best practice market research to shape our messaging and to harness community influencers to help change WHS expectations.
12. increases the focus on improving WHS capability and the quality of WHS advice to organisations including for example by:
 - a. supporting initiatives to improve the quality of WHS knowledge and education.
 - b. supporting the maintenance and development of Australia's OHS Body of Knowledge as the free underpinning evidence base for WHS.
 - c. leveraging and supporting the existing WHS infrastructure built by WHS professional industry associations in the form of their certifications.
13. increases the focus on the critical role of governments as large (ideally best practice) employers and as policy creators, investors and purchasers.
14. recognises that Australia needs a modern, responsive, capable and importantly adequately resourced WHS regulators.
15. include activities to show the economic links between healthy and safe work and long-term organisational sustainability.
16. includes health and safety systems as a focus area, supporting continuing evolution and maturity of:
 - a. WHS tools and systems from 'safety-based' into explicit 'health and safety systems', and
 - b. health and safety performance evaluation, by supporting the establishment of new frameworks for measuring WHS performance with an appropriate mix of lead and lag indicators.

Priority Industries

Seven priority industries (agriculture, road transport, manufacturing, construction, accommodation and food services, public administration and safety, and health care and social assistance) were included in the current AWHSS. These were prioritised based on the high numbers and rates of injury and/or fatalities or were by their nature hazardous. This approach remains valid.

However, the proportion of workers employed in different sectors is likely to quickly change over the next decade due to the increasing use of artificial intelligence, robotics, digitisation of work, remote communication technologies, and other emerging technologies. Industry prioritisation in the new strategy should carefully consider where large numbers of workers will be employed, especially in emerging sectors using new technologies, where both organisations and regulators may not fully understand how to manage the WHS risks.

It is challenging for many duty holders in regional and remote locations in Australia to understand what they need to do to ensure their workers and themselves remain safe and healthy at work. New technologies and applications will provide opportunities to reach and influence duty holders who are likely never to have a visit from a regulator, industry association representative or union.

Recommendations

That the next AWHSS:

17. when determining priority industries consider existing high-risk sectors and emergent industries.
18. increase the attention on regional and remote Australian workplaces and how digital technologies can be used to support duty holders in these locations.



Priority Injuries and Conditions

The traditional focus on preventing traumatic injuries and fatalities and musculoskeletal conditions were viewed as appropriate and will continue to be required. Over the last half of the AWHSS, in response to high profile events and growing community expectations, there was significant national initiatives around work-related mental health conditions, some cancers and lung diseases. Our stakeholders commended the increased focus in the latter years of developing workplace exposure standards to provide practical help to reduce and monitor exposure to hazardous chemicals contributing to lung disease, cancer and contact dermatitis.

Despite the significant harm burden and stakeholder views that adequate controls are not being implemented, there was very little national activity supporting improved management of noise-induced hearing loss.

Many respondents commented on the general scarcity of robust national and jurisdictional data and evidence on hazard exposure, controls adequacy, and prevalence data, especially for long latency conditions. They raised important questions around what data can and should be used to determine new national priorities.

Based on the available mortality and morbidity data, the list of priority conditions was viewed as still relevant. However, most regulators are not in the Institute's view currently adequately resourced to provide adequate attention to that many conditions, and we suggest the list be reduced in a future document.

Recommendations

That the next AWHSS:

19. consider limiting the number of priority injuries and conditions to focus resources on those with the highest mortality and morbidity.
20. continue the focus on the prevention of work-related traumatic injuries and fatalities.
21. increase the focus on conditions arising from event based and cumulative work-related exposures to:
 - psychosocial hazards (including bullying, harassment, and occupational violence),
 - biomechanical and physical hazards, and
 - hazardous substances increasing the risk of lung disease and other chronic occupational illnesses.

Implementation, Reporting and Promoting

There have been improvements in WHS across Australia, evidenced by reducing traumatic fatalities and injury rates (and probably priority conditions). The national conversations about health and safety have become more sophisticated, and we have made improvements in the last decade. However, (a) because of the failure to link strategy with action and metrics, we cannot know to what degree the AWHSS contributed to those improvements, and (b) there are also many areas of lack of progress. We collectively have not delivered the AWHSS outcomes we all wanted and should have achieved.

There has been a significant unrealised opportunity in the use of the Strategy as a flagship document to unite diverse interests throughout the health and safety community, work towards common goals, and enter collaborations and partnerships to reduce unnecessary duplication and silos.

This was in our view due to several factors, including the failure to develop clear implementation plans for each action area, priority industry and conditions, and the inadequate investment in performance metrics, including targets to monitor and evaluate activities; this should be addressed in the next iteration.

As noted earlier, restricting signatories to just governments, two industry associations and the ACTU excludes not just marginal contributors to the strategy's outcomes, but also significant contributors, alienating them from the Strategy and failing to leverage their contributions.

The new strategy should clearly articulate how WHS stakeholders including academics, educators, and WHS professional associations can help to achieve the vision and goals.



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Reporting annual AWHSS progress and the midpoint review occurred but was focused toward Safe Work Australia Members – again ignoring the role of others in outcomes. There was limited external reporting of strategy activities and achievements. When it was provided, it was so high-level that interested stakeholders viewed it as just another government document not relevant to them.

That Institute believes Safe Work Australia members should insist that the new strategy has clearly articulated implementation and evaluation and reporting plans, including more widespread reporting, and more regular and independent review. The WHS community is intensely interested in how governments, industry, and social partners are working towards safer, healthier, and more productive workplaces. Transparent reporting of activities, achievements and lessons learnt will be an important way to keep stakeholders engaged and committed to playing their part.

The rate of change in Australian workplaces is expected to accelerate. We believe an independent biennial review of strategy progress, published on appropriate websites, is appropriate. This review can be used to update action plans, advise parliaments and stakeholders and, if necessary, change targets and strategic priorities.

We strongly recommend that Safe Work Australia members adopt a communications approach that positions the strategy as a national flagship document, relevant to all interested in WHS and designed to increase engagement and widespread buy-in to its goals and action plans.

Recommendations

That the next AWHSS:

22. includes clear implementation plans for all action areas, priority industries and conditions to provide greater accountability.
23. develop evaluation and reporting plans within the first six months and report on these in accordance with these plans.
24. adopt a communications approach, which positions the strategy as a national flagship document, relevant to all who with an interest in WHS and designed to increase community engagement and buy-in to its goals and activities.
25. include independent biennial reviews of AWHSS progress, with the outcomes used to update action plans, advise parliaments and key stakeholders and if necessary, amend targets and strategic priorities.

Conclusion

The previous 2012-2022 Strategy was well constructed with the right focus areas for its time, but especially in the second half of its term over the last five years, lost its primacy and relevance as a nationally significant guiding document.

It is a story of largely unfulfilled potential, under-utilised as a flagship policy document, under-measured, under-reported, and under-evaluated. Which means nobody can know today whether it has actively contributed to the progress in WHS over recent years.

The new Australian Work Health and Safety Strategy has the potential to be a nationally significant guidance document establishing visionary goals, describing the pathways to those goals, defining empirically and descriptively what success would look like, and which is regularly reviewed and adjusted to meet the needs of a rapidly changing environment. This paper seeks to support the creation of such a document.

As one of the wealthiest countries in the world, with robust WHS laws, we should collectively expect and demand of ourselves that we produce world leading WHS outcomes over the coming years. We urge the Australian Government to see the potential of the strategy as an expansive and unifying document in an area which is consistently hampered by politicisation and self-interest. A bold, national strategy will give diverse stakeholders a sense of ownership in a shared future of healthier, safer productive workplaces, that can galvanise diverse interests towards common goals.



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