

Communicating occupational health and safety across languages compliance code – Public comment submission form			
Note: Areas marked with an asterisk (*) denote required information.			
Type of submission *	Individual <input type="checkbox"/>	Organisation <input checked="" type="checkbox"/>	
Organisation name * (where applicable)	Australian Institute of Health and Safety (Victorian Branch)		
First name *	Andrew		
Last name *	Heinrichs		
Email address *	vcomchair@aihs.org.au		
Postal address	Click here to enter text.		
Postcode *	3043		
State *	VIC		
Do you consent to WorkSafe publishing your submission?*			
	<input checked="" type="checkbox"/>	Yes – WorkSafe may publish this submission with my organisation’s name/my name.	
	<input type="checkbox"/>	Yes – WorkSafe may publish my submission, but please publish without my name.	
	<input type="checkbox"/>	No – WorkSafe may not publish my submission due to confidentiality reasons.	
Note: All submissions will be treated as public documents and will be published online unless clearly identified as being confidential. Where the submission is from an organisation, WorkSafe will publish the organisation’s name, not the author’s name.			
Does your submission contain personal information of any third party individual/s?	<input type="checkbox"/> Yes	If yes, have you obtained consent from the third party individual/s to include their personal information in your submission?*	<input type="checkbox"/> Yes
	<input checked="" type="checkbox"/> No		<input type="checkbox"/> No
Note: If you have not obtained consent from the third party individual/s, WorkSafe may elect not to publish your submission or may redact third party information from your submission.			
Can WorkSafe contact you about your submission?		<input checked="" type="checkbox"/> Yes	
		<input type="checkbox"/> No	
Note: WorkSafe may use the information you have provided to inform you of further development of the proposed compliance code.			

Disclaimer: To the full extent permitted by law, WorkSafe does not accept liability for any loss or damage suffered or for any claims whatsoever arising in any way from any party making a submission or any third party included, identified or named in a submission in any way or form.

Privacy Statement: This information is being collected for the purpose of WorkSafe receiving and responding to public comment on the proposed compliance code. In providing a submission, you agree to WorkSafe collecting this information and handling it in accordance with our privacy policy. You can access our privacy policy, including information on use, disclosure, security, access, correction and complaints, [here](#) by calling 1800 136 089 (toll free).

How to fill out this form

This form contains a table for the proposed Communicating occupational health and safety across languages compliance code (code) which lists different parts of the code.

Scroll to the section of the code you want to comment on and type in your comment. Disregard any sections that do not apply.

If you only have general comments about the code, you can simply fill out the first table preceding this page and disregard the rest of the form.

If you want to mail your submission, you can fill out the form online first then print as the tables will expand according to the amount of words you write.

For any questions about the form, email legislation@worksafe.vic.gov.au.

Proposed code

Please provide your general and specific comments on the proposed code in the table below. Where possible, please indicate the section of the code you are commenting on.

General comments	
Click here to enter text.	
Specific comments	
<i>Introduction</i>	Click here to enter text.
<i>Part 1: Understand and plan for your workforce information needs</i>	Click here to enter text.
<i>Part 2: Communicate for understanding</i>	
<i>Part 3: Provide language support</i>	<p>We disagree that ‘machine-automated interpreting and translating tools’ ‘should not be used to translate OHS information’. Organisations with diverse language workforces with 1) remote work locations that are difficult/costly to access for hired translators, 2) frequently require communications to and between workers relating to OHS risks and controls, and/or 3) have budget restraints that preclude extensive engagement of translation personnel, would benefit greatly from using digital technologies to assist in translation activities. We recommend clause 80 is reviewed given that, whilst technologies should not be relied upon exclusively, when used well they present significant opportunities for those organisations facing the challenges listed above. These technologies will continue to improve in accuracy. Their broader use will likely enable improved workplace communication and subsequently OHS outcomes. Regulatory guidance should not explicitly advise against and discourage employers (and workers) from investigating and using these technologies in this area.</p>

<i>Part 4: Provide training</i>	Clause 114 should refer to paragraphs 63-64, not 64-65.
<i>Appendix A: The compliance framework</i>	Click here to enter text.
<i>Appendix B: Compliance checklist</i>	Click here to enter text.
<i>Appendix C: Communication checklist</i>	Click here to enter text.
<i>Appendix D: Sample language profile questionnaire</i>	Click here to enter text.