Diane Smith-Gander: the future of OHS

Amcor’s safety strategy: by the numbers
Accreditation: a game changer for OHS education
Peter Wilkinson on safety critical elements
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Riding the waves of change

There are a number of important changes on the horizon for the OHS profession, and these changes are already making themselves felt across business, writes Craig Donaldson

"How often do we see extreme reluctance to invest capital in safety-related improvements, even when there is a clear picture and solid evidence of long-term benefits, purely due to achieving short-term savings, or rather an illusion of it?"

The OHS Professional editorial board 2017

Craig Donaldson, editor, OHS Professional

Developments in technology, shifting workforce demographics and the changing nature of work are all having a significant impact on a range of professions globally. OHS is no exception to this, and these three factors combined are already leading to changes in both the practice and profession of OHS.

The cover story for this issue features Safe Work Australia chair and board director Diane Smith-Gander, who discusses these changes in depth and explores the implications for OHS. One of the predictions that Smith-Gander makes is that health and safety leaders are going to have to become part data scientist, part behavioural scientist, and part anticipatory risk manager in understanding and staying ahead of a range of emerging trends. These are going to bring different hazards and risks to the workplace, and Smith-Gander explains that OHS will need corresponding ways of keeping workforces safe and believes the skillset of the OHS leader is going to change enormously over the next 10 to 15 years. For the full story please turn to page 14.

Our management feature for this edition is on Australian-based multinational packaging company Amcor, which has a great safety turnaround story to tell. Just under 10 years ago, its recordable case frequency rate (RCFR) stood at 8.4, while its lost time injury frequency rate (LTIFR) was 1.9. Last financial year, Amcor’s RCFR had fallen to 2.0 while its LTIFR had also fallen to 0.56. “Whether we consider Amcor to be successful or not, starts and ends with safety,” explains Amcor’s vice-president for safety, environment and sustainability, David Clark, who says hand injury is one of the most common workplace risks facing the business.

As a result of a holistic and concerted campaign – strongly supported by the business’ leadership – hand injuries have subsequently reduced from 80 per cent to 50 per cent of total injuries. For the full article please turn to page 24.

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UK Govt urged to end safety deregulation post-Grenfell Tower blaze

The UK government has been urged to scrap its approach to deregulation of health and safety legislation following the Grenfell Tower blaze. In an open letter to Prime Minister Theresa May, more than 70 leading organisations and figures from the UK’s safety and health profession have jointly called for a political sea change in attitude towards health and safety regulation and fire risk management following the tragedy. The collective has also pressed the government to complete its review of Part B of the Building Regulations 2010 – the regulations which cover fire safety within and around buildings in England – as a matter of urgency, and to include a focus on improved safety in the forthcoming Parliament.

OHS laws & regulators failing to keep up with technological changes

The NSW government recently called for the introduction of a national five-star safety rating system for quad bikes in order to reduce related fatalities in the agricultural sector. Since 2011, 115 people have been killed in quad bike accidents on Australian farms, with 32 in NSW alone. NSW Minister for Innovation and Better Regulation, Matt Kean, said NSW would call on the federal government to introduce a safety rating system, and would provide any support necessary to help develop and implement the scheme. “We believe a rating system is the next big step to reducing deaths and injuries from quad bike incidents,” Minister Kean said. “We want to work with manufacturers and farmers to develop a scheme, which would give buyers the information they need, at a glance, to make the safest possible choice. This is about putting consumers first and doing what we can to keep farmers safe at work.”

Minister Kean said a safety rating system for quad bikes was a key recommendation of the NSW Deputy Coroner’s 2015 inquest into quad bike deaths.

...
There’s always room for a voice that speaks for many

As a community of OHS professionals it is important that our unique perspective is prosecuted in a way in which industry, governments and those that actively influence society cannot ignore, writes Patrick Murphy

For as long as communities have existed, groups of people have come together to promote their shared interests within their community. Whether it be unions, employer associations, industry groups or professional associations such as the SIA, their constituents reflect a diverse range of people ultimately brought together by their common and shared interests. These interests are articulated and over time have an impact on social fabric and culture.

Our interests and objectives as OHS professionals and practitioners in their most basic form aren’t commercial. Everything we do is in the service of our vision for safe and healthy workers in productive workplaces. The SIA is a reflection of this. Our constituency is the health and safety profession, so the activities we undertake are with those people, in the service of that vision – either to build the capability of the profession or to be a voice for the profession.

Furthermore, as the nature of work continues to change, the role of an OHS professional must too evolve. No matter where you are in the world, what industry you work in or the OHS performance of the organisation, our job is never really done. When the focus of OHS is lost in the face of other competing priorities, people get seriously sick, hurt or die. Organisational culture, industry culture and national culture all significantly shape and impact health and safety, and all of these cultures are constantly in a state of change, so our work as a voice for the profession to positively influence these cultures will never end.

As long as a workforce exists there will be a health and safety advocacy job to do, and health and safety people have an important and unique voice to be heard on health and safety issues. However, the dynamic of associations is changing rapidly, and so our approach to our role as a voice for the profession must also change. How successful we are as voices for our constituencies depends on our ability to understand the shifts in the environment we are seeking to influence. For example, the communications and information technology revolution has, within only two generations, profoundly changed virtually every element of our lives. People are growing up with different concepts and experiences of their connection to others. They have different views about the very concept of “association” than their previous generations – the way they associate with other individuals, and their expectations of how “associations” like the SIA should operate has changed. So, too, the way we think about OHS is changing – we are on the edge of a new frontier of thinking about safety differently in a modern world.

The way we associate is evolving and changing, and the smart professional bodies are thinking more like Netflix and less like Blockbuster. However, not everything changes. Evidence tells us that although many young people expect to associate in a different way, they still want an influential voice and still believe that advocacy is critically important. The media revolution, which now provides a platform for spectacular clashes of opposing ideologies and social media “opinionism” rather than journalism, has in some ways created a more difficult environment for the evidence-based, trusted voice to hold a place. But just as many people today as ever still want to influence the bigger picture, to see positive influences at a national scale, to see advocacy on their behalf as a result of their work. In a recent SIA survey completed by nearly 900 health and safety people, respondents of all ages were extremely strong in telling us that they want the Institute to do more advocacy on behalf of the profession, to (a) build the status of health and safety people within Australian companies, and (b) promote business culture with a stronger focus on health and safety including increased investment in health and safety issues. It’s a big task, but the profession has thousands of voices who, the more they work together, the more influential they can be.

Despite the Institute being generations old, our quest to reinvent ourselves continues and our work in advocacy is really only just beginning. As a community of OHS professionals it is important that our unique perspective is prosecuted in a way in which industry, governments and those that actively influence society cannot ignore. Part of this involves the Institute being generations old, our quest to reinvent ourselves continues and our work in advocacy is really only just beginning.
Safety critical elements: overcoming human and organisational challenges

It is important to put critical controls, which can prevent major incidents, at the heart of management and preventive activities, both for regulators and operators, writes Peter Wilkinson

In the early 1990s, in the aftermath of the Piper Alpha disaster, and Lord Cullen’s inquiry into it, the UK’s Health and Safety Executive (HSE) set about implementing the subsequent Cullen Recommendations. Among the recommendations was a requirement to implement a safety case type of regime. This had a number of elements: a Formal Safety Assessment (FSA) which facilitated the identification of SCEs to prevent fires, explosions and to facilitate escape, evacuation and rescue; and a safety case that included a safety management system to manage the FSA and SCEs.

Within HSE we had an internal debate, because we could not do everything at once – which should come first? Should it be the Safety Case Regulations to require a Safety Management System (SMS), or the regulations intended to prevent and manage major emergencies (PFEER), which included the identification of SCEs?
This was no mere academic question. Such was the eagerness and pressure to implement the Cullen Recommendations, whichever came first would receive a great deal of attention, probably at the expense of whatever came next. There was vigorous debate within HSE as to what we should do. As I was involved in HSE’s work on the SMS in the immediate post-Piper Alpha era, you will not be surprised to hear I supported addressing the safety management system issue first. It seemed the most important, interesting and exciting thing to do. There was not a lot written on safety management at the time, and what did exist was not always of high quality.

“In the context of organisational culture, values must be complemented with organisational practices to support them”

But I was wrong! We should have developed the regulations which contained the requirements for the FSA first, which in turn permitted the SCEs to be identified. Had we done this we would have positioned the SMS as the enabler of the SCEs and FSA. The (very good) technical team developing the SCE concept would have benefited from our advice and we (in the SMS team) would have learnt more about the interactions between safety management and the SCEs. As it was, excellent but almost “pure” SMS guidance was written and legislation enacted. However, it was slightly detached in some ways from the SCEs, as the safety management requirements appeared in the safety case regulations and the SCEs in the PFEER regulations.

Post-Piper Alpha we focused on many fronts simultaneously, and mostly successfully. At the same time we were grappling with issues associated with the old prescriptive legislation, developing new regulations and guidance and building our new organisational structures and processes. Examples of the work at the time included managing the large number of exemptions needed from the old prescriptive legislation associated with fire pumps and standby vessels. We were also delivering a much higher presence by HSE in terms of inspections, audits, conference presentations and so on. This presented major challenges around recruitment, training and maintaining our regulatory ethos.

Developing the SCE concept was but one of many new developments. However, it was far sighted and arguably ahead of its time in common with some of the other innovations which flowed from the new regulatory approach.

However, since Piper Alpha, we have inevitably seen developments in our understanding of major incident causation and therefore prevention. For example, it was only after the Piper Alpha disaster, and after the concept of SCEs was conceived, that Professor James Reason produced his influential book *Managing the Risk of Organisational Accidents*, which included his familiar so-called Swiss Cheese Model.

Other improvements in our knowledge include a greater understanding of the role and meaning of organisational culture as applied to safety.

**Does any of this matter?**

Does it matter that we now have a much better knowledge of these topics? I think it matters in so much that we now understand that the priorities we assigned (SMS first, FSA/SCE second) had ramifications that still impact what we do today in both regulators and in companies. Some of these impacts are summarised below.

- **SCEs viewed through the prism of safety critical equipment.** SCEs require performance standards typically characterised by the need to be drafted in predominantly engineering terms. What is the *functionality* of the SCE, what is its *availability* and *reliability*? What is the *survivability* of the Emergency Shutdown Valve? This language has encouraged a view that SCEs are predominantly about the engineering and are managed (or maintained) using the maintenance management system.

- **Organisational procedures and processes managed with less rigour than the engineering?** The language of SCE performance standards such as *functionality, availability and reliability* does not work well with organisational processes or procedures. However, major incidents invariably have human and organisational factors which could have been more rigorously managed. Does that mean that we should ask for a separate set of performance standards – managerial performance standards – in addition to the engineering-focused ones?

- **A less-than-integrated approach to SCEs, control or barrier management?** Does this approach to SCEs inadvertently encourage a focus on the engineering, at the expense
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of other parts of the system such as the human and organisational factors (HOF)? Furthermore, the so-called Hierarchy of Controls (HoC) posits that an engineering control is better than a procedural control. However, is it not the case that engineering controls (such as an ESDV, for example) need to be maintained and used by competent people, using procedures within a suitable organisational culture?

It could be argued that we are already doing this. Possibly, but this article is suggesting that each control is looked at in a way that integrates at a critical control level, how in practice the engineering-focused performance standards are integrated with the process and procedural ones. An example of this can be found in the International Council on Mining and Metals’ Critical Control Management Implementation Guide.

Currently, it is not uncommon to find that procedural or organisational controls are dealt with at a system level (such as the Competency Management System) rather than viewed through the lens of the critical control. Other industries have grasped this nettle and explicitly focused on the critical controls (a synonym for SCEs), and how they need to be managed in practice to integrate the engineering controls with the procedures and organisational processes.

• Terminological confusion? It is common to hear people in the offshore oil and gas industry (including regulators) talking about Safety Critical Elements: Barriers (as in a two-barrier policy in wells), Defences, Measures, Controls and so on. Regulatory guidance uses all of these terms. Do we need this plethora of language to say much the same thing? Could we not simplify this and just use “critical controls”?

• The special problem of organisational culture. One final thought relates to organisational culture. We all know its importance. Many of us have commissioned research from leading academics, think tanks, and human factors consultants. But how far has it got us? I am not sure, but that of course is not a reason to relax our efforts in trying to understand the problem better. However, there are a number of ideas gaining greater traction in this area which I believe are important.

First, the Safety Institute of Australia has published its OHS Body of Knowledge: Organisational Culture, in which it says in the Abstract: “…safety culture remains a confusing and ambiguous concept in both the literature and in industry, where there is little evidence of a relationship between safety culture and safety performance.” This is a necessary caution which comes from a detailed literature review carried out by respected researchers.

Second, and on a more positive and intuitively attractive note, a number of respected commentators have pointed out that, in the context of organisational culture, values must be complemented with organisational practices to support them. You cannot have one without the other. Humans seem to be very good at identifying any mismatch between the two.

Furthermore, a focus on practices can influence the culture. One cannot see or touch values but practices can be seen and measured. Thus, a focus on risk controls, double block and bleed as a process isolation instead of a single valve isolation, for example, is a practical way to influence organisational culture. Perhaps we can shift our focus on organisational culture from the academic and intangible to the practical and observable?

Conclusion

The work on SCEs was radical in its day. It represented a significant step forward in how we worked and was a great success. But the world has moved on. We now know much more about the management of safety in general and human and organisational factors in particular.

Have we properly integrated the knowledge gained post-Piper Alpha into our current managerial and regulatory strategies?

Peter Wilkinson is general manager risk at Noetic Solutions, an international safety expert in the oil and gas sector and served as an adviser to the investigation into the BP Deepwater Horizon disaster in the Gulf of Mexico. He co-presented a series of workshops around the country for the Safety Institute of Australia earlier this year.
Accreditation: a game changer for OHS education

There have been a number of important developments with the Australian OHS Education Accreditation Board and the status of accredited OHS education in Australia, writes Mike Capra.

The Safety Institute of Australia works to advance the health and safety profession to deliver highest quality health and safety advice to industry and through being a voice for the profession to positively influence health and safety practice. In seeking to advance this agenda, the SIA has organised itself around four strategic pillars, namely, capability, policy and research, engagement and member services.

The issue of capability is both a challenge for and central to the OHS profession. For the SIA, capability is achieved through a core body of knowledge, assured high quality professional education and training, clear understandings of role and skill requirements at each level of OHS work, certification of professionals and practitioners and continuing professional development. These key elements of capability are the cornerstone of any profession.

The SIA has a long history of involvement in OHS education, beginning in the 1960s with Eric Wigglesworth and others who were instrumental in developing the first formal safety training programs and continuing through to the present day with SIA representation on course committees, providing lectures and presentations to students and awarding of academic prizes.

In 2009, a study of OHS education in Australia by the Australian Learning & Teaching Council presented a very negative view of OHS professional education at the time with recurring themes being:

• a loss of programs, especially at the undergraduate level
• staffing and general resource issues
• undervaluing of OHS within the university organisation
• challenges in adoption of modern technology.

Consultation conducted as part of the Safeguarding Australians project also suggested that the OHS programs may have been “too soft” and graduates may not have had the ability to apply learned theory in work environments. It was in this setting that the WorkSafe Victoria-funded OHS Body of Knowledge project commenced with the required deliverables of:

• development of the OHS Body of Knowledge
• accreditation of university-level OHS education
• certification of OHS professionals.

In 2011, as an outcome of the OHS Body of Knowledge project, the Australian OHS Education Accreditation Board was established. Its mission was to ensure that OHS professional education is based on educational design and review processes and delivery of learning appropriate to develop graduates equipped with the knowledge and skills to enter the workforce as effective entry-level generalist OHS professionals. This mission was underpinned by the vision that OHS professional education should be based on strong scientific and technical concepts, evidence informed, delivered by competent persons and so recognised by the
profession, government, industry and the community. While established under the by-laws of the Safety Institute of Australia, the Accreditation Board is independent in its decision making on standards and accreditation. This independence is supported by the broad representation on the Board [see box].

As OHS education accreditation commenced, the Australian higher education sector was undergoing change with the establishment of the Tertiary Education Quality Standards Agency (TEQSA) and the implementation of the Higher Education Standards Framework (HESF). This was an environment of change placed pressures on universities but also created an environment potentially open to the concept of professional accreditation for OHS education. Such accreditation brought OHS education in line with other non-regulated professions such as engineering, accounting, computer science and dietetics.

After six years of operation it is appropriate to review the achievements of the Accreditation Board and the status of accredited OHS education in Australia. The first accreditations were awarded in 2012. In 2017, of the 15 universities offering OHS education, 12 have one or more accredited programs with one assessment being in progress and two under program review or not at a stage where they can submit for accreditation. Of 29 eligible programs, 25 are accredited, with the early accreditations now coming up for re-accreditation as part of the five-year cycle (see table for details of accredited programs).

Registrar of the Accreditation Board, Pam Pryor, said, “It is not all about numbers”. A review of the implementation of accreditation conducted in 2014 found that:

“Accreditation is impacting on the quality of OHS professional education in Australia. This impact varies from providing a stimulus for minor review and ‘tweaking’ to revision of whole courses within programs. Accreditation has also created leverage for obtaining resources within the universities and for implementing change. Major areas of change were made to ... tightening assessment processes ... the accreditation process also enabled [universities] to articulate and build on strengths to establish their profile in the Australian OHS education context.”

Accreditation is not a tick-box process and is not easily achieved. Assessments are a combination of a desktop audit of documents and electronic learning management systems together with interviews of staff and students. The assessments are carried out by a panel of OHS academics and OHS professionals with the full Board reviewing the panel report before determining the outcome. From 19 assessments, seven achieved straight accreditation, 10 required additional action or were placed on six-month monitoring, and two were not awarded accreditation at the time. All accredited programs have improvement plans requiring annual reporting. Emeritus Professor Bruce King, education adviser to the Accreditation Board, considers that the educational impact of OHS accreditation has been considerable in two ways. First, the approach taken by the Accreditation Board together with guidance materials for institutions, have focused university attention on issues such as clarification of aims of the program, capabilities of graduates, quality of the information provided to intending students and clarification of assessment requirements. Second, institutions report that the specification of accreditation assessment criteria and guidance as to what might constitute appropriate evidence that accreditation criteria have been addressed has been extremely useful in helping teaching teams think about their programs.

Professor King also said that the Board has consciously sought to align its processes with other quality assurance requirements of higher education institutions, such as the Australian Qualifications Framework and the expectations of the Tertiary Education Quality Standards Agency (TEQSA). Such alignment supports a coherent approach to accreditation by the various bodies and reduces workload of university staff. Again, institutions have commended this approach.

The litmus test for the impact of accreditation is in the capability of the graduates and their ability to influence evidenced-based practice. Angela Seidel has been an independent OHS professional member of the Accreditation Board since its inception and participated in a number of assessment panels. Angela commented that she has seen enhanced learning outcomes for graduates of tertiary education resulting in more reasoned and informed approaches being taken and less of a “gut feel” approach to workplace safety issues.

2017 is a time of change for OHS accreditation and the Accreditation Board. The accreditation criteria have been revised to reflect the new institutional standards with which universities have to comply, and universities will be working to meet the new criteria through accreditation assessments and the annual review process. The Accreditation Board has welcomed new members in Genevieve Hawkins, general manager, safety, health and wellbeing for Coles, and Graham Jackson, director safety and engineering, Transport for NSW. The Board has also recruited new OHS educators to replace the outgoing Leo Ruschena (RMIT University) and David Cliff (University of Queensland). The Board is currently seeking an employer representative as Chris Sutherland (MD, Programmed) has stood down after supporting the Board and the accreditation process through its first six years.

2017 will also see the transition of the registrar role from Pam Pryor to Meagan Browne. The registrar role is crucial to the effectiveness of the Accreditation Board.
### Status of OHS accredited qualifications as at July 2017

| Australian Catholic University | OHSE M |   |   |
| Central Queensland University | OHS    | ✔ |   |
| Curtin University             | OHS    | ✔ |   |
| Curtin University             | OHS/Health Promotion |   | ✔ |
| Edith Cowan University        | OHS    | ✔ |   |
| Griffith University           | Safety Leadership |   | ✔ |
| Latrobe University            | Ergo, S & H |   | ✔ |
| Monash University             | Occu & Enviro Health |   | ✔ |
| Queensland University of Technology | OHS |   | ✔ |
| RMIT University               | OHS    |   | ✔ |
| Federation University         | OHM    |   | ✔ |
| University of Newcastle       | WHS    |   | ✔ |
| University of Queensland      | OHS Science |   | ✔ |
| University of South Australia | OHS M  |   | ✔ |
| University of Western Australia | WHS |   | ✔ |

In process; not submitted; under review or new program

Emeritus Professor Mike Capra, chair of the Accreditation Board, said that Pam had been a driving force for the establishment and functions of the Board and has created processes that will greatly facilitate the continued successful operation of the Board. Not only does the registrar act as secretary to the Board and manage the accreditation process, but Pam has created a very constructive relationship between the Board, the universities and individual program co-ordinators and educators. Professor Capra noted that the Board has appointed a worthy successor to Pam in Meagan Browne, an OHS professional, previously a senior manager with an OHS regulator and an inaugural member of the Accreditation Board.

Patrick Murphy, chair of the SIA, summed up the importance of OHS education and the role of the Accreditation Board in ensuring quality OHS education by referring to the definition of a profession issued by Professions Australia: “A disciplined group of individuals who adhere to high ethical standards and uphold themselves to and are accepted by the public as possessing special knowledge and skills in a widely recognised, organised body of learning derived from education and training at a high level, and who are prepared to exercise this knowledge and skills in the interest of others.”

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Diane Smith-Gander: taking the lead on safety

Craig Donaldson speaks with Safe Work Australia chair and board director Diane Smith-Gander, about the state of the WHS profession and what lies ahead for the health & safety professionals of the future

How can WHS leaders best work with boards and directors to practically advance effective safety outcomes in their organisations?

In essence, people work best together when they have a shared agenda, so WHS leaders need to try to step into the shoes of directors, and think: “What is it that the director is trying to do when it comes to health and safety outcomes?” If you can understand that shared agenda of ensuring that the directors discharge all of their responsibilities to keep people safe at work, the sustainability of the organisation that they’re stewarding, and the reputational and risk management issues around this, on behalf of shareholders and other key stakeholders, then it’s much easier for WHS leaders to start a good dialogue with directors. This moves the conversation away from one about compliance to one of “What are the outcomes we’re really trying to achieve?”

WHS leaders can work well with directors if they ensure that the meetings that they have with directors – be it in committee or even with the full board – actually occur onsite. WHS professionals should get involved in taking directors around on safety walks, rather than having tours of operations, which a lot of boards are very fond of. Then you as a WHS leader can educate the board on what a safety walk looks like, what it is you’re looking for, and how you interact with people in the workforce. This starts to show directors what a leading indicator looks like in practice, versus what a lagging indicator or a KPI might look like.

We always talk about “the standard you walk past is the standard that you accept”. If we see something that is not safe, it is important to stop the work and shine a light on it. Exactly the same thing goes for safety committee meetings and other interactions that WHS leaders have with boards and directors. If they believe that the meeting isn’t effective and it is focusing on lag indicators as opposed to lead indicators, or it isn’t the proper conversation about safety, then you have to put your hand up and work to get a more effective committee meeting. This is moving past compliance and ticking the boxes, to a proper conversation about what it is you’re all trying to do, which gets you that shared agenda.

How many organisations genuinely take a proactive approach to WHS, versus those that take a reactive, compliance-driven “tick the box” approach?

I think that the regulators of the different jurisdictions are doing some very good things in terms of leading on this issue. When you look at visits where regulators are going out to workplaces they will have particular things that they’ve identified as potential problem areas, or where there are new regulations, this is where WHS regulators do the vast majority of their work, as opposed to the approach of “I’m coming because there’s been an incident in the workplace”. I really like the fact that regulators are role-modelling this spirit of the things that we’re supposed to be following – and they are focused on providing information that’s going to help keep workplaces safe.

I’ve also observed that more organisations understand the leading indicator versus the lagging indicator, and they’re starting to report those, particularly in their sustainability reports. AGL like to call this the “anticipatory culture” so those large organisations can demonstrate good practical examples for other companies to follow, as people do read these sustainability reports and will gather some of their ideas from there.

In this nation I think we have well moved past...
Diane Smith-Gander, Safe Work Australia chair and board director
the notion that it’s about compliance and ticking boxes, to something that’s much better. When I go and have my haircut, as I walk in the door, the hairdresser is very keen to make sure that I’m walking carefully, that there are not cords snaking around the floor because that’s a trip hazard. So when WHS starts to make it into those small businesses in that very real way, with care for customers, you know you’re heading in the right direction.

I know that the normal curve applies and there are some organisations that are still very much in a box-ticking mode. But I do think that we’ve got a well-educated workforce and we’ve got active industry organisations and active unions that are pushing very hard in this area. And I do think it’s that partnership between the unions, the industry associations, and the regulators and the good conversation that’s happening there – combined with the understanding that safe workplaces are productive workplaces – that will keep us moving in the right direction.

**How can WHS leaders genuinely help build a culture of real safety leadership in organisations from the board down to the executive and from there?**

I believe you have to make safety truly an organisation-wide conversation. If you are just thinking about operations and areas where hazards are more likely to exist which are likely to impact workers, you’re not going to build a true safety leadership culture. It’s just as much about head office as it is about operations.

When I was chair of services provider Broadspectrum, there was a lot of work done by the CFO to ensure that their safety forums were in head office. He led one forum where he talked a lot about safety at home and how he felt that a culture in the organisation was likely to be truly embedded when you found yourself, at home, standing on a proper ladder to get to the top cupboard, rather than standing on the kitchen chair. Or when you went out to mow your lawn, you actually didn’t go in a pair of thongs, but you went in a pair of enclosed shoes and wore safety glasses.

So inclusiveness in the organisation where everybody talks about safety, is an important part of having a real culture of safety leadership and ensuring that all of the senior executives have safety as one of their objectives and that it’s appropriate to the work they do. So if you’re the person who’s responsible for process design and engineering in the organisation, you need to have an objective which is around ensuring that the way you design an engineering process is to design and engineer safety in, and that this has an explicit objective.

**What do you think about safety KPIs for executives, and should there be bonuses attached to good safety outcomes?**

There’s a debate which says, “You don’t pay for safety”. And I agree with that; it is not right. However, you could certainly modify incentive schemes. And a lot of people use this modified approach, which says that, “If the safety outcomes are not as we expect, and it’s normally an improvement, say year-on-year on a frequency rate or something similar, then we might apply a number less than one as a modifier on the incentive outcome that you’re expecting”. This is about saying that it’s the way you get outcomes that are just as important as the outcomes themselves. So I think that that modifier approach has some potential to be useful.

Thinking about how safety is a driver of performance and having objectives within an executive scorecard that relate to that is a good idea, but they must be well designed to drive real change and not be vulnerable to manipulation. A process engineering person, for example, would have on their scorecard something very explicit about whether or not they’re designing safety and actively checking and responding to any early warning signs. And other executives might have an objective that requires them to check that the risks are being controlled; say during their regular safety walks. And if the leading indicators don’t improve, then they wouldn’t receive an incentive for that element of their scorecard.

**How do you see the professional skillset of WHS leaders evolving over the coming years?**

I think health and safety leaders are going to have to become data scientists. There’s an enormous amount of data that’s available from safety observations and so forth, and I think they’re going to have to understand how to use software robots to dig into that data. This will make for more meaningful actions and understandings of where hazards really exist in organisations.

I think they’re also going to have to become behavioural scientists, because the way that people interact with work is going to be different. I know that hazard identification improves when you provide an app for staff to be able to log what
“I believe you have to make safety truly an organisation-wide conversation”
“In this nation I think we have well moved past the notion that it’s about compliance and ticking boxes, to something that’s much better”
they see because it makes it a whole lot easier. You don’t have to fill out forms and you can take a picture with your phone of the hazard that you saw and it’s much easier to then be able to weed out duplicates, and you can get a message that comes back and says, “Yes, we’ve seen that one and it was identified on such and such a day and we’re moving forward.” So I think we need to recognise the new environment that we’re working in and be able to deploy technology such as wearable technologies. It always intrigued me that I can watch the Tour de France and know exactly what the heart rate is of the guy that’s on the front of the breakaway pack, but I couldn’t necessarily see what the vital signs were of someone working in a confined space. So I think we can use a lot of the technology and learn lessons from things like sport and other areas.

I think WHS leaders are also going to have to become much more of an anticipatory risk manager. They’re going to have to understand emerging trends – things like the ageing workforce and what that’s actually going to mean, and the gig economy and how this and the uberisation of the workforce is affecting how work gets done. These are going to bring a whole lot of different hazards and risks to the workplace, and we are going to need corresponding ways of keeping our workforce safe. So I think the skillset of the WHS leader is going to change enormously over the next 10 to 15 years.

How do you see WHS as a broader professional body evolving over the coming years?

Every manager has the responsibility for keeping their people safe. So I’d like to see the WHS professional as someone that can move in and out of the role, that can be a line manager for part of the time and really understand what it’s like to be in that person’s boots. Perhaps they could be in a broader HR role or a strategy role, so that there’s an integration of safety into the way we do things in our organisations. Because of the nature of the way we work, you’ll always need to have that group of professionals who are creating that constructive tension between the line managers and safety professionals to ensure we get the best outcomes. But I’d like to see more crossover of people into more mainstream areas. I also think we will work a lot more with partners in organisations, and I see that the WHS professional will evolve to have more of an understanding of how you work within an ecosystem of partners. We already have a bit of that today with contractors and so forth, but this will only become more pronounced. And the WHS professional has a huge amount to do with keeping the customers of an entity safe. There are obviously huge benefits for organisations if they can ensure that their public liability claims are lower going forward. So work that will be done in that regard will make the WHS professional a very valuable person.

**“The skillset of the WHS leader is going to change enormously over the next 10 to 15 years”**

I think about roles in insurance companies for people who understand how integrated vehicle management systems work, and can take those learnings and knowledge from the corporate sector and bring that into the consumer space as we start to see driving support systems, and these sorts of things are incorporated as our homes and workplaces become more automated. People will interact with these systems, so this is going to require a range of new skills to help manage this – we will need a person who is a risk manager, a behavioural scientist, a data scientist, and then we need to think about how they might deploy that set of skills in other endeavours.

**What steps can WHS professionals take to develop both personally and professionally to meet the needs of the future?**

Getting line experience is very important. If someone’s away for leave, put your hand up and say, “I’d actually like to act in that line role. I’d like to go and work in my business partner’s area for a period to get that experience.”

Technology education and understanding how apps work and so on and so forth, are very important skills to have. And there is a huge body of knowledge for WHS, so you can share that effectively. When Safe Work Australia went from running physical conferences to its virtual seminar series and creating online information assets and so forth, the engagement of WHS professionals with this, and the learning and sharing of best practice that was facilitated, was much greater than it had been in the past. So it’s about building your network and not feeling you have to create the wheel yourself, all the time. It’s a way to leverage very quickly and understand what the workplace of the future is going to look like.

Diane Smith-Gander is chair of Safe Work Australia and Asbestos & Eradication Council; a non-executive director for AGL Energy, Wesfarmers Limited: a board member of Keystart Loans, Henry Davis York, CEDA; and immediate past president of Chief Executive Women.
The OHS learning curve

There are significant trends impacting OHS education and training, and universities and training providers need to adapt accordingly to keep up with broader business, demographic and technological changes, writes Craig Donaldson

Changes in OHS in the workplace are filtering down to universities, with many responding proactively to these changes through changes to both curriculums and how education is delivered. Susanne Tepe, associate professor of OHS at RMIT and program leader for RMIT’s OHS postgraduate programs, says changes in OHS education are very much a reflection of the changes in the nature of work. “OHS education needs to recognise the issues related to information technology and production technology, types of employment and the role of professionals, to name a few issues,” Tepe explains.

As Australia focuses less on traditional manufacturing and more on people-centred employment, she says OHS education has moved from focusing on (but not neglecting) the traditional manufacturing hazards which are known and static, to hazards resulting from people adapting to the workplace and people around them. “Psychosocial hazards, adaptive workplaces and organisational cultures need to be discussed in much more detail. Organisations have become much more flexible and adaptive, explains Tepe, and as a result, she says “OHS people can no longer rely on command and control or citing regulation but need to move to influencing and working with people to achieve their results.”

Bruce King, Emeritus Professor at the University of South Australia and member/education adviser to the Occupational Health and Safety Education Accreditation Board, observes that the trends in OHS programs at university level are really not very different from those in other areas, however, what is distinctive is the capacity of those responsible for the programs to respond. “This is partly because OHS does not have a common discipline base within universities. Some programs are offered in engineering schools, while others have a science or health science base; this means that what happens in OHS is very conditioned by the approach taken by other programs delivered from those schools and they do tend to vary between disciplines,” he says.

Second, OHS programs are typically quite small in terms of student numbers, and this in turn tends to mean teaching is handled by relatively few staff, so change of any kind increases the pressures those people are under. King says the consequence of this is the responses to various pressures will be addressed with differing degrees of commitment, simply because there is only so much they can handle.

OHS education challenges

There are a number of common challenges and pitfalls for both organisations and individuals with regards to OHS education, and Paul Rothmore, senior lecturer and academic lead in environmental and occupational health sciences at The University of Adelaide, says that one for organisations is a failure to harness the knowledge and expertise that tertiary-educated students can bring to a workplace. “It is likely that we will see increasing professionalisation of the OHS workforce in coming years. Workplaces will only become increasingly more complex and new OHS challenges will emerge. Tertiary OHS education, based on the development of problem-solving skills, can equip individuals with the expertise to address these yet-to-emerge challenges,” he says.

Tepe observes that educationalists have had to realise that their students very often have demanding jobs and are unlikely to always be in the home city to attend classes. She explains that RMIT has chosen to respond to this challenge by teaching face to face in block mode but providing online tutorials. Students can still have the cohort experience of studying with a group of people (for a week) but have the flexibility to be outside Melbourne for tutorials. “Individuals need to recognise that education requires time and money. You can minimise both, but at the end of the day, you have to be able to learn in a manner that suits you (not all of us learn well online or just by reading) and to a level that is appropriate to what you want to do with the knowledge (do you just want a mark or do you want to know stuff that you can use),” she says.

More broadly, King says two of the pressures OHS education faces include the growing disparity between the way students access information generally in their personal and professional lives in comparison with the way programs are delivered, and the growing emphasis on external pressures for accountability in university programs. “The first is hardly new and has been growing over the last two decades, but university educators have been slow to respond and what they do varies considerably even within the different units of the same program, often because the teaching staff concerned have widely differing capabilities in relation to information technology and their understanding of the processes of teaching and learning. The second is much more recent and is creating considerable pressure on teaching staff,” he says.

The impact of technology on education

Universities have embraced the use of e-learning, says Rothmore. From a student perspective this allows them to study without attending on-campus lectures, and from a university perspective e-learning allows for flexible delivery and greater geographic reach to potential
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students. It also allows them to more closely monitor student interaction and activity. “The analytics built into these learning management systems allows the university to monitor student access to course materials and content which enables early identification of students who may not be engaging with the course,” says Rothmore.

A primary driver is the desire of universities to extend their reach to potential students by providing flexible course delivery options. “It is also a response to identified student needs to accommodate their desire to meet work and family commitments while also completing tertiary qualifications. This is particularly relevant in the field of occupational health and safety education where many students remain in full-time employment during their studies,” he says.

While changes in technology impact almost all areas, in teaching – which is about the management and delivery of structured knowledge, skills and understanding – King says educators have tended to adapt technological possibilities to existing approaches to teaching and learning rather than seize the opportunity to do things in different and possibly more powerful ways. For example, instead of maximising the potential of tools provided by the university, such as learning platforms like Moodle, King says educators have tended to use the capacity of IT to reproduce very old technologies, by doing things like recording lectures and disseminating them online. While lectures can have their potential of new delivery tools.

OHS educators make the most of the very powerful technologies available in the learning platforms institutions typically provide,” says King. “These are typically well structured to support a range of motivational, delivery, engagement and support activities for students but are frequently used in extremely limited ways, as though the technology involved had been bolted on to existing practices, rather than those practices reconceived to maximise the potential of new delivery tools.

“I am struck time and time again by how little OHS educators make the most of the very powerful tools available in the learning platforms institutions typically provide,” says King. “These are typically well structured to support a range of motivational, delivery, engagement and support activities for students but are frequently used in extremely limited ways, as though the technology involved had been bolted on to existing practices, rather than those practices reconceived to maximise the potential of new delivery tools.

Getting the most out of OHS training

There are number of important trends and developments in the OHS training space, according to COO of Safety Wise, Jo De Landre, who believes it is encouraging to see that personnel are not only receiving technical/operational training, but organisations are recognising the importance of “non-technical” skills. “When we look at the incidents occurring across industries, we usually see that a qualified, licensed, competent person who had received all of the appropriate operational training, who was otherwise fit and well, who had access to a current procedure, who had signed off the relevant risk assessment, and so on – was involved in a significant incident.

“Many times, the contributing factors fall into the realm of human factors/non-technical skills such as decision making, communication, teamwork, etc. Most mature organisations are recognising the value of providing training in human factors/non-technical skills to complement operational/technical training.” De Landre notes that some industries are now mandating human factors training, and she says this is an encouraging sign that regulatory authorities are aware of and understand the importance of human factors in maintaining safe operations.

Organisations need to carefully identify what type of training is required and who the most appropriate candidates are, rather than just have an idea and fill courses, De Landre adds. “Attendees should be informed well in advance about the training but also be given an idea about what the training is actually targeting. Too often, we see organisations nominating personnel for training and they turn up not knowing exactly why they are there and what the focus is,” she says.

The other major issue associated with lack of effectiveness of training is that the subject areas are not contextualised, and De Landre says attendees need to be able to know how to apply the learnings back at work and onsite. “Accordingly, trainers need to understand who the attendees are, their background, and so on, and give solid, practical examples to demonstrate the learnings, not just talk theoretically,” she says.

Training is a constant challenge for people within an organisation, who are already very busy, to take time out and focus on training, De Landre observes. Too often, she says training is held in-house – which means come break times, the attendees are rushing off to check emails, return phone calls and meet up with personnel back in the office, which distracts from the training. “Trainers have to appreciate and recognise the interruption to normal operations and production when personnel attend training and the importance of ensuring the training is effective, efficient and attendees can take the learnings back to site,” says De Landre.

It can cost a lot of money for an organisation to send personnel on training courses, according to De Landre, and she says there has to be a return on investment for the organisation. “Key learnings and takeaways must be specified and demonstrated throughout the training. Any course should not just be informative, but have an applied focus and the attendees should walk away with a clear picture
of what they may do differently or how they can apply the learnings when they return to work. An applied focus through the use of discussions, scenarios and practical exercises can keep attendees focused. Engagement, participation and relevance are key to effective training,” she says.

The Tertiary Education Quality Standards Agency (TEQSA)

There is a growing pressure for accountability on universities, according to King, who says this stems from both governmental desires to reduce expenditure in education given other budgetary demands, and a genuine commitment to ensure that public funds are well deployed.

This has led to the creation of agencies charged with the creation and monitoring of standards such that universities are obliged to demonstrate they are providing a comprehensive and well-developed set of resources for students. The most obvious of these new bodies is the Tertiary Education Quality Standards Agency (TEQSA), which sees students as its primary stakeholder and has established a broad range of provider and delivery standards that universities have to meet to retain their status as self-accrediting bodies. King says TEQSA is also working to link its expectations to the requirements of the professional accrediting agencies that exist within many discipline areas, of which the OHS Education Accreditation Board is but one example.

“OHS through the Board has taken significant steps to ensure that its requirements reflect those of TEQSA and where possible tailored accreditation criteria to reflect those of the agency,” he says. “This was done by helping OHS educators and professionals to understand the new requirements and involving them in translating those demands into OHS-specific language. In this way, the attempt was made to streamline processes by requiring information that institutions were already committed to providing to the central agency, and providing resources such that there was evident guidance as to what might count as acceptable evidence to demonstrate that expectations were being met. Many OHS educators have said that the approach taken by the OHS Board has been helpful and even provided, through its well-documented support materials, an approach that can be applied in other discipline areas.”

The use of OHS professionals in reshaping TEQSA requirements to the OHS field and developing resources to support educators is a reflection of the Board’s view that involvement of OHS professionals is a critical dimension of ensuring that what is offered in programs reflects best practice in the field, according to King. “So one of the requirements we have is that those delivering programs demonstrate that they have processes whereby current practising professionals are involved in the development of new programs and their monitoring. We seek evidence that those professionals have been given a real opportunity to have input and are not simply used to rubber-stamp decisions already taken within the university.”

Review of VET WHS qualifications

The Australian Industry Skills Committee (AISC) recently approved a review of the VET WHS qualifications. The review is under the Business Services Industry Reference Committee (IRC) and is being managed by Skills For Australia (PwC) which is the Skills Support Organisation. The qualifications under review are:

- BSB30715 Certificate III in WHS
- BSB41415 Certificate IV in WHS
- BSB53135 Diploma in WHS
- BSB60625 Advanced Diploma in WHS.

The rationale for change includes:

• The need for WHS workers to be equipped with the skills and knowledge to provide effective advice on managing WHS appropriate to their level of operation while supporting productivity and workplace morale
• Alignment with the Global OHS Capability Framework as an international benchmark to enable a high standard of capability among WHS students and in turn inform employers and regulators as to the capabilities of WHS students
• Review of the ongoing relevance of the Certificate III and Certificate IV in WHS
• Concern that current units of competency are vague and outdated
• It is important that OHS professionals and practitioners contribute to the discussions on the VET WHS qualifications review which will determine the structure of the qualifications and the content of the units of competency for years to come.

As part of the consultation for this review, PwC is undertaking face-to-face public forums in most states and has an online survey. For more information on these and the review of VET WHS qualifications visit www.ohseducationaccreditation.org.au/2017/07/review-of-vet-whs-qualifications-consultation.

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“Whether we consider Amcor to be successful or not, starts and ends with safety”
Amcor has taken a scientific, data-led, engineering approach to improving OHS outcomes across its global business. Craig Donaldson speaks with Amcor’s head of safety, environment and sustainability about how this approach has yielded with a significant reduction in hand injuries.

Ten years ago, it’s fair to say that Australian-based multinational packaging company Amcor’s safety statistics were not great. Its recordable case frequency rate (RCFR) stood at 8.4 while its lost time injury frequency rate (LTIFR) was 1.9. Just under 10 years later, Amcor’s OHS story is very different. Last fiscal year, its RCFR had fallen to 2.0 (corresponding to 147 injuries across its global business, with some 31,000 employees around the world) while its LTIFR had also fallen to 0.56 (corresponding to 41 cases across its global business). And for a business with about 200 sites across more than 40 countries, 57 per cent of its sites had been recordable injury free for a period of 12 months or more at the end of December 2016.

“The most important result is that we continue to decrease the number of people who are injured,” says David Clark, Amcor’s vice-president for safety, environment and sustainability. “Whether we consider Amcor to be successful or not, starts and ends with safety.”

There are a number of important strategies and initiatives that helped support and contribute to Amcor’s ongoing OHS improvements, according to Clark, who says there is a strong focus on eliminating serious injuries by focusing on managing critical risk areas. “We also maintain a close watch on the impact of processes and procedures; we audit their implementation and improve them continually based on how they are actually used in our live operating environments.”
“What we are increasingly focused on is influencing human behaviour, so that people are able to work safely during every task, every day”

Leading safety from the top
Amcor’s portfolio includes flexible and rigid packaging, with 95 per cent of its sales into the food, beverage, healthcare and tobacco industries, generating sales of more than US$10 billion last financial year. “Customers, employees, suppliers and investors all hold stakes in what Amcor does and how we do it – and that includes how we approach safety. Our obligation is to give our people the right tools, equipment, training and processes to do their jobs safely. We want everyone who works for us to return home safely, every day,” explains Clark, who says Amcor’s board, CEO and senior management team are all committed to further enhancing workplace safety performance. “With locations in more than 40 countries, we engage site leadership with safety so that it is delivered consistently and relentlessly at every Amcor site. They are responsible for engaging everyone at their plants through toolbox talks, regular safety updates, and sharing of safety priorities and data.

“It starts at the top: working with our leadership team to define, and then maintain, Amcor’s safety culture and behaviours. To support that, I work with our global safety steering committee (GSSC) to develop and deliver Amcor’s safety strategy, standards and auditing program,” says Clark, who provides guidance as business groups develop strategic plans that address their local, regional and business safety priorities. Amcor’s GSSC monitors safety performance, actively addresses safety trends and shares best practices across the business. The committee is also charged with the continual improvement of Amcor’s safety policy and governance. The committee meets formally once per month by conference call, and determines global safety policies and standards, and more recently global safety campaigns that take place across the whole organisation. The GSSC also endorses a number of sub-committees. For example, one team works on fire safety across the business and another has worked on standardising the approach to confined space entry across 200 sites.

Safety standards, audits, matrices and reporting
Amcor has mandatory global standards for safety, environmental management and security, while
its business groups report monthly to the Amcor board on compliance with global standards and local rules. Different business groups also benefit from Amcor-wide agreed performance priorities and metrics, and Clark says these cover a number of safety topics: “Crucially there is a focus on those activities that, when performed well in the front line, help to prevent accidents,” says Clark.

Like many organisations of Amcor’s scale, it uses internal and external audits to measure and track its safety program. “Our safety experts then use that data to create performance improvement plans with our business groups and for specific regions and countries,” says Clark, who explains that the audits have found that while sites are very safe in general, there are gaps in implementation of the standards, and in some cases misunderstandings in the intent of the standard and how it should be applied to protect co-workers and contractors. “When we find gaps during site audits, the gaps are added to their local plan for corrective action. On a global level, one interesting trend we’ve addressed is gaps in understanding of our safety standards by some line managers, especially our site managers,” says Clark.

“We developed an online training tool to help them better understand the contents and intent of our safety standards and the audit process. At several sites we found gaps in compliance with our machine safety standard. We used this information in developing our global hand safety campaign, with an emphasis on proper machine-guarding and maintenance, as well as behaviours related to safety when working with equipment. The other thing that we see is increased engagement from our employees who feel that they are working for a company that cares about their safety and wellbeing.”

Amcor has also standardised its safety management system across all sites in Australia, and its unified system is certified to AS 4801 Safety Management System. One benefit of this is that contractors working across multiple sites have one induction covering safety rules, augmented with a site-specific orientation tour. Another benefit is the Australian team now has a standardised hazard management system with one risk matrix (replacing five) and the same register, risk assessments and process. “The team is aware of the risks associated with the sites and uses the matrix to inform decisions on safety priorities. The site operations manager is responsible for completing actions for the hazards raised in the register with the safety team providing support for the manager on the process,” says Clark.

For each workplace risk, Amcor takes into account the hazard and complexity of the activity. Risks are assessed by considering the probability of an incident occurring, the severity of the potential incident, and exposure in frequency and duration. A matrix is used to determine the options for risk control, or if multiple risk controls are needed. “For example, we just completed a machine-guarding exercise to increase the level of physical guarding on equipment, in addition to the procedural controls that were already in place. We’ve seen the benefit in terms of a further reduction in hand

“Customers, employees, suppliers and investors all hold stakes in what Amcor does and how we do it – and that includes how we approach safety.”
injuries resulting from people’s interaction with machinery,” he says.

**Risk reduction and hand injuries**

Amcor uses sophisticated printing and converting machinery in the course of its operations, and Clark says the greatest safety risk facing Amcor is maintaining the safety of people when working with those machines. Amcor has strategic safety plans and procedures focused on reducing its other identified major risks, which include machinery, fire prevention and safety, work at height, and confined space entry.

Because of the nature of its operations, hand injury is one of the most common workplace risks. “We continue to invest in plant and machine safety, worldwide. In 2016, we ran a global initiative to upgrade machine-guarding and a review and enhancement of machine procedures,” explains Clark, who says that more than 6000 equipment safety issues have been identified and corrected while 2000 plus maintenance procedures were reviewed to ensure that guarding and interlocks were being tested during maintenance.

As a result, hand injuries have reduced from 80 per cent to 50 per cent of total injuries, and Clark says this is largely thanks to improvements in machine-guarding and procedures. “Overall injuries from equipment have declined as well. However, there are still too many hand injuries, most of them easily preventable if we all understand better how to behave safely, every day,” he says.

Amcor also launched a behavioural safety awareness campaign in April 2017, which focused on engaging every worker around safe behaviour that protects hands. The campaign included signage, posters, stickers and more – designed to remind Amcor employees to protect their hands. In addition, a series of 12 toolbox talks on best practices of hand safety were held at every operational site. “By placing communication materials at crucial decision-points in our operations – in change rooms, next to machines, and large-scale on site walls – we remind co-workers to use protective equipment, follow procedures and communicate clearly with one another to avoid injury,” says Clark.

An extra behavioural component was also added to the safety campaign, urging people to identify risks to their hands before they start activities, to verify that they have the proper tools and the right Personal Protective Equipment – and ultimately the ability – to perform the task safely, he says. Amcor’s “safety time-out” approach is now being introduced at all operational sites.

Amcor also produced a video of an employee who had suffered a serious hand injury at one of its European sites. “We engaged colleagues worldwide by making the topic of hand safety personal. The colleague suffered serious hand injuries while operating a machine. We shared the video by a managed cascade – starting with the CEO and his reports watching it, and our senior leadership team sharing it with their reports – right down to the front line. Because of the emotional content, we provided them with
Advice for OHS leaders

Success in OHS comes when people across a business feel a collective sense of ownership and accountability for safety, according to David Clark, Amcor’s vice-president for safety, environment and sustainability. “OHS leaders need to consistently advocate for, achieve and maintain a collective view of safety performance and the actions that need to be taken to drive it higher,” he says.

A further obligation on OHS leaders is to continue the identification and sharing of available best practice and to make sure the business has the tools to implement those practices fully. Finally, he says OHS leaders need to ensure organisations have the means to measure the progress and impact of safety actions across the operations.

“Our ultimate obligation is to nurture an environment where people across our organisation are committed to collaboration, sharing information and combining resources to achieve breakthroughs in safety – this is how OHS leaders can best contribute to the goal of getting everyone home safely at the end of every work day,” he says.

Lastly, Clark recommends taking a strong scientific, data-led, engineering approach to identifying risks and the root cause of those incidents that do take place and then systematically eliminating them.

guidance on how to introduce and discuss the video. More hand safety videos with co-workers are currently being produced,” says Clark.

It was recommended that the screening and discussion be led by business leaders, rather than be delegated to safety leads. After watching the video, teams were tasked to reach agreement about the actions each of them and their functions will take to further raise awareness and influence behaviour about hand safety.

The corporate communications team, with support from the GSSC, is continuing to lead implementation of the Amcor-wide hand safety awareness campaign. This includes toolbox talks at operational sites, visual materials across all Amcor locations (including offices), and regular online stories about hand safety best practices and workplace safety. “We also distributed a printed letter from our CEO, Ron Delia, to all Amcor colleagues worldwide. This was issued with gloves to underscore the hand safety imperative,” he says.

Another major safety initiative completed across Amcor’s flexible packaging business in Asia Pacific was the “do not touch” campaign – a subset of the hand safety campaign. It identified areas of machinery where people interacted with moving parts, and the goal was to eliminate these interactions wherever possible. “Cross-site department teams – for example, colleagues from the printing department from all sites – worked together on solutions following the hierarchy of control; this included improved guarding,” says Clark.

Another major safety initiative completed across Amcor’s flexible packaging business in Asia Pacific was the “do not touch” campaign – a subset of the hand safety campaign. It identified areas of machinery where people interacted with moving parts, and the goal was to eliminate these interactions wherever possible. “Cross-site department teams – for example, colleagues from the printing department from all sites – worked together on solutions following the hierarchy of control; this included improved guarding,” says Clark.
Is safety an important organisational function or a cosmetic feature?

Maintaining profitable and sustainable safe operational balance between production and protection in practice is a black art of managing safety and risk, writes Goran Prvulovic

An increased number of reports and analyses conducted by various consultancies across major industries are indicating that over the last couple of years, more and more Australian companies are “delegating” their HSE function internally to other functions to manage, much more than what has traditionally been the case. Mass scaling down of HSE support teams has significantly degraded meaningful HSE support across many organisations, and representation of the HSE function at executive levels has rapidly declined to the point where experienced and qualified senior HSE professionals are increasingly hitting the glass ceiling career-wise. Many are kept at lower management levels and are now reporting through other support functions.

Some fundamental HSE questions
What does that really say about the industry, and more notably about the importance and equality of safety as a business function? A number of fundamental questions can be asked at this point:

• Why does perception exist that management of HSE risks and critical support this function provides to the business is a second-tier function, apparently the one which can be managed by any other “mainstream” or support functions?
• Is this perception and common practice effective, and is this supported by any real safety statistical data on the national level?
• Can HSE be really important in an organisation where the HSE function is of secondary importance?

It is surprising how many senior executives who are responsible for the HSE function in various organisations do not have any formal safety qualifications, or practical or technical experience in management of HSE risks. A quick browse around some of the biggest organisations in Australia and overseas is enough to prove this point. A large number of those executives come from a range of other professional backgrounds such as engineering, accounting, metallurgy, human resources or law, just to name a few. Quite often they are surrounded by technically strong HSE professionals, advising, coaching, leading, doing the legwork, developing, and influencing decision-making processes, however, the invincible “glass ceiling” is still there, restricting them to lower stratum levels, just beyond the executive and board levels.

There are countless stories of HSE executives and managers who assisted and even drove successful organisational restructures to minimise costs, only to be made redundant and their portfolio allocated to financial, human resources or other support functions. Interestingly, even Australia’s most popular employment site, SEEK, does not have a dedicated category for health and safety professionals; it is listed under human resources.

Ironically, the “safety first” philosophy so commonly used to promote safety in the past seems to have also been applied in a similar fashion when it comes to cost cutting, restructuring and “streamlining” support functions. The HSE function has been consistently hit first and hard, marginalised and undermined, often without obvious immediate effects but with easily foreseeable significant risk and latent disabling effects to people and organisations.

“Mass scaling down of HSE support teams has significantly degraded meaningful HSE support across many organisations”
“Representation of the HSE function at executive levels has rapidly declined to the point where experienced and qualified senior HSE professionals are increasingly hitting the glass ceiling career-wise”

organisational levels. Similarly, although people are certainly an important factor, human resources and safety are vastly different subjects in this context. Due to depth and complexity of each, neither function can effectively manage the other without obtaining in-depth knowledge in each particular discipline.

Aside from being a complicated, multidisciplinary scientific discipline requiring a great deal of generalist knowledge, leadership and experience, management of safety and risks also requires a specific technical and operational HSE knowledge. Above all, it requires independence in thinking and reporting, to be able to effectively communicate risk-based information and in turn create and enact critical organisational defences, systems and processes, as well as enable and support critical thinking and risk-wise decision making at the most senior organisational levels. This independence is an absolutely critical factor and the common failure of the organisational structure model described in this article.

A view from other functions

It is perfectly natural and understandable that in many cases senior executives from finance, operations, HR or any other function have conscious and unconscious conflict of interest and bias in the way they perceive risks, which is often evident and visible in how critical risk information is interpreted, delivered and how decisions about management of risks is made. Again, this is perfectly normal, as safety and protection on one side and production and profitability on the other are often at natural odds. Balancing those is the key in safe and productive operations, as so widely acknowledged in safety and management literature. After all, we are human and prone to a variety of bias, often developed and deeply entrenched from our upbringing, professional training and years of professional experience under the consistent emphasis of what is important, driven by our individual professions and functional goals.

As an example, how often do we see extreme reluctance to invest capital in safety-related improvements, even when there is a clear picture and solid evidence of long-term benefits, purely due to achieving short-term savings, or rather an illusion of it? Imagine cognitive dissonance and bias occurring internally within a finance executive (an accountant) who also “looks after” the

HSE function in terms of managing priorities such as controlling short-term costs and their immediately seen and felt benefit, against unseen and uncertain but very real HSE-related risks. Imagine this level of unconscious bias in decision making. It is not difficult to see the human factors involved and challenges this allocation of responsibilities presents. An old Eastern European saying describes this conflict of interest and an internal struggle by stating that “rabbits are generally poor guardians of cabbage”.

Similarly, delegating HSE and risk-management functions to human resources due to HSE being seen as a “people-based” function is riddled with issues. Although people and relationships are important in management of risks, management of HSE risks is not about managing or controlling people or their performance. On the contrary, people are the solution to HSE issues, most HR professionals even at executive levels do not have adequate technical, tactical or strategic knowledge. In many ways, we lead the world in organisational risk balance and guiding the organisations towards safer and more productive waters. In many ways, we lead the world in management of safety. Based on that, we must conclude that most motives for keeping HSE as a second-tier organisational function are based around what senior people in organisations truly believe about safety itself, often at unconscious levels. This is the core issue. If we leave verbalisation of safety and formal organisational advertised positions aside and look at this issue with brutal honesty, the fundamental assumptions and beliefs involved in decisions to “second-tier” HSE functions are the ones where safety is perceived as a function of lesser complexity, easier to manage by others, or is simply a function of lesser importance. Actions speak louder than any words to the contrary.

So, how is this approach working for us on the national scale?

Safe Work Australia statistics indicate that from 2003 to 2015, a total of 3207 Australian workers died as a result of workplace incidents. In 2015 alone, 195 workers died, in 2016, 178, and this year to date, 57 workers lost their lives. Just in 2013-2014, there were 113,965 serious compensation claims. Despite some reduction in fatality rates over the years, it simply cannot be argued that our
current approaches in management of HSE risks are working, at least not in the way they should be, morally and legally. It seems that we have reached the point in time where we really need to think differently and strongly consider regulation of the safety profession and legislating presence of senior HSE advice in organisations, very much along the lines of statutory functions prescribed in some regulatory jurisdictions for electrical, quarrying and classified plant activities. Surely competent HSE advice is just as critical for safe operations, or one would at least hope so.

There is one logical question that should be asked at this point. If safety and management of HSE risks are critical business goals and objectives, as so commonly professed, is it possible that one of the reasons for poor performance in this area is precisely the practice of “second tiering” of the HSE function in organisations, especially in the way risks are communicated, discussed and prioritised at the executive and board levels? The evidence and experience of many safety practitioners indicates that this is indeed a crucial barrier to further improvement in safety performance on the national level. As an example, how often do we see financial function in the organisation delegated to other functions to manage?

The simple answer is – never, because it is simply seen as too important, yet tragically, health and safety of people is seen as something almost anyone can do. As the above figures representing dead and disabled directly contradict this belief, the only logical but sad conclusion is that safety really isn’t that important after all.

One of two most senior and influential organisational roles which is specifically structured to ensure the criticality and importance of its function is the role of a Chief Financial Officer. This is perfectly appropriate as the function is indeed important, specifically in terms of decision making and communication to senior decision makers and the board itself. The point is, shouldn’t safety and information about risks be just as important, and more to the point, can safety be important in an organisation if the very function intended to drive its focus, support and promote it within the organisation is suppressed and marginalised? It doesn’t seem likely, as there appears to be no other example available where a highly ranked organisational goal has been consistently achieved while at the same time its support function was consistently marginalised and managed by people with no relevant skill and experience.

**The hard reality for HSE**

Organisations sometimes do some really strange things with management of safety and its functions. Imagine the situation where a bridge is being built and the engineer reports to a person with no understanding of engineering. The engineer delivers design advice, instruction and analysis, only to be told by his boss that he “does not agree” and that a different approach will be taken. And so the engineer watches as the bridge is built which has no chance of being stable or ever reaching the other side. It is hard to imagine such foolishness, but unfortunately this is precisely what happens in safety, all the time.

As a consequence, in environments where HSE is not represented at executive levels, true risk-related information and discussion is often lacking in quality and balance. Even more importantly, this information often does not reach board level, at least not in its most accurate form, which often results in decisions which do not benefit the organisational long-term interests.

On the other hand, competent senior HSE executives and managers are able to promote conversations at the most senior levels around true forms of leadership, people and human factors, systems, processes, safety myths, ownership and accountability, and in turn set not only what is truly important at the executive level, but also create the same perceptions of importance in the mindset of senior and middle managers. Those are key owners of safety, able to drive key operational processes and direct people and resources, and are truly in a position to change organisational performance and culture of safety.

Organisations are essentially social institutions, made up of people working at various stratum levels. All of them have perceptions of what is really important in the organisation, and those perceptions are true organisational reality, being crucial factors for creation of the culture of safety. Contrary to what many senior decision makers believe, this perception is not set by language, slogans, intranet pages, KPIs, goals and posters. Rather, it is set by organisational practices, visual cues and observable and practical actions. Employees pay much closer attention to a practical display of hierarchical power in the workplace and what importance is given to functions in organisations rather than any formal organisational structures and charts. This practical status or importance has critical influence when it comes to operational decision making at the work execution level, specifically around the balance between production and protection, operational discipline and safety-related workplace behaviours such as occurrences of system violations and risk trading for convenience.

Where safety managers sit alongside their peers with remuneration, office availability and location, status and reporting structure, as well as...
“Organisations sometimes do some really strange things with management of safety and its functions”

the presence of safety professionals at executive levels, do in fact demonstrate organisational commitment to HSE as a whole.

Safety cannot become an “overriding commitment”, “first priority” or a “primary value” in an organisation if the principal function intended to drive, structure, promote and guide it is downgraded and treated as a second-tier, auxiliary function. How safety professionals and safety functions are treated sit on the organisational reporting matrix and their status is of major significance, because it matters to employees working on the sharp end with risks. Without people and their engagement, management of HSE risks is nothing more than an illusion. Risks and priorities in organisations are defined formally but often viewed, communicated, perceived and executed very informally.

Safety’s never-ending journey

If we think of safety as a continuous and never-ending, organised effort to maintain the balance between production and protection as two fundamentally conflicting goals, achieving good safety performance in an organisation is a matter of appropriately allocating time, knowledge and resources, which is in turn critically dependent on what is perceived as “important” in an organisation. What characterises advanced and resilient organisations is this setting and priming of safety as “the important function” on the organisational level and resulting risk-wise decision making this approach produces. This comes mostly from the influence of mature leadership, usually led by competent and educated safety professionals who promote diversity in thinking, technical competence, appropriate risk language, coaching, methods of risk communication and risk awareness throughout the organisation.

This is not to say that members of other functions are not able to do this effectively, however, management of HSE risks is one of most difficult organisational functions to manage. It requires broad multidisciplinary knowledge in technical risk management, operational knowledge and advanced human factors, in addition to general psychology, toxicology, epidemiology, and many other areas. This is why the safety profession and tertiary education in safety exists, to provide this level of competence and critical support to organisations on their journey of discharging ethical, moral and legal obligations.

So, if safety is really that critical in organisations, shouldn’t we be demonstrating this importance by having that importance visible at the board and executive levels, instead of obtaining risk view, information and advice through secondary means, and by inadvertently filtering, screening and potentially distorting and misrepresenting critical information?

If safety does not deserve to sit at the table at that level, how is safety to influence and obtain a seat at the table at lower, operational levels where execution of work and balance of priorities creates safety in practice? So with that in mind, if you are a chief executive officer, managing director or a senior decision maker in an organisation, ask yourself the following questions:

- How do you know that you are getting accurate HSE risk-related information, uncontaminated with bias from other, often naturally goal-conflicting business functions?
- Can you reasonably expect that your direct reports, their managers and supervisors have a seat at their table for a HSE expert if you have not applied the same approach?
- Do you believe that the executive team does not need high-level HSE advice, mentoring and support and that all of your executives “know” safety? If so, why do you employ them?
- Is it possible that the absence of high-level professional HSE advice at executive levels is causing imbalance between productive and protective activities and decision-making processes? Are there any warning signs?
- Is your current organisational structure organised in such a way that it inadvertently undermines and suppresses risk-related communications, technical advice, and objective risk view from reaching the most senior organisational levels?
- Does your current structure truly demonstrate your organisational commitment to management of HSE risks, and does this align with the company advertised position on safety?

Just like in creating organisational culture, diversity or equality at the workplace, what is really important in organisations is not what we say it is, but rather the things to which we are paying close and systematic attention to. Safety is only important if people working with risks believe it is, and for this to occur, it needs to be demonstrated in practice top down and through strong leadership and sound decision-making processes. It is very difficult to demonstrate this level of commitment in safety if the organisational HSE support function becomes secondary importance, even if it is only a visual impression.

Maintaining profitable and sustainable safe operational balance between production and protection in practice is a black art of managing safety and risk. It requires a great degree of knowledge and skill. To achieve it and sustain it, every organisation pursuing this valuable state should not only invest in competent and educated HSE professionals, but also ensure their equal status at all organisational levels and enable this advice and risk voice to penetrate all stratum levels and reach the most senior levels without filters, translations and functional interpretations.

Goran Prvulovic is principal consultant of RiskWise Solutions, a West Australian risk management consultancy specialising in leadership development, operational discipline and enhancement of organisational safety culture.
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