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In Reply please quote: ST:MG

17th January, 2014

The Hon. F.J. Nile
General Purpose Standing Committee No.1
Parliament of NSW
Macquarie St
SYDNEY NSW 2000

By Email gpscno1@parliament.nsw.gov.au

Dear Mr Nile,

**Re: Parliamentary Inquiry into Allegations of Bullying at WorkCover
NSW: Public Service Association responses to Questions on Notice.**

Please find attached the PSA's answers to the questions on notice raised from the Parliamentary Inquiry.

This includes the PSA's view on WorkCover's development of a workplace bullying policy with the said policy attached.

We also answer the supplementary questions raised by the Committee Representative, Adam Searle.

Yours faithfully,


STEVE TURNER
ASSISTANT GENERAL SECRETARY

**Public Service Association
Answers to Parliamentary Questions on Notice**

WORKPLACE BULLYING POLICY

The draft Prevention of Workplace bullying, discrimination and harassment policy was provided to the PSA on 26 July 2013. The PSA was required to provide feedback by 9 August 2013.

The policy was also provided to the Work Health Safety Committee and they were given a longer period in which to provide their feedback.

On 4 October 2013 the PSA was provided with information about what had and had not been considered in our feedback. This information was provided only after escalating our complaints about the consultation process.

On 5 November 2013 the PSA was advised that the policy had been finalised and was to be published. A copy of that document is attached for your information.

The PSA advised that we were still not happy with the policy because it moved away from dealing with reports of bullying in a safety environment and moved back to simplifying matters as individual grievances. The PSA was informed later that day that our earlier comments had been taken on board and the policy would not be published until further consultation had occurred.

The policy was discussed in a meeting with the Chief Executive Officer and the Director, People and Culture on 26 November 2013. In that meeting in-principle agreement was gained to respond to reports of bullying with a safety investigation rather than necessitating a disciplinary investigation into alleged misconduct. It was agreed that should the safety investigation uncover any behaviour which could be potentially misconduct then that part could be referred for disciplinary investigation at that time without impacting on the ability to continue to address any identified safety issues in the workplace.

This has been a major change in approach and most welcomed by the PSA. We feel this will move investigations of reports of bullying away from an approach which seeks to apportion blame and towards an approach which seeks to find solutions to where there is an unhealthy workplace environment.

A copy of the October 2013 policy is attached consistent with the question taken on notice at page 15 of the transcript.



Safety, Return to Work
& Support Division

Prevention of workplace bullying, discrimination and harassment policy

October 2013

Policy information

This document is for internal Safety, Return to Work and Support Division use only.

TRIM document number:	D13/130879
Status:	FINAL
Policy owner:	SRWSD Chief Human Resources Officer
Approved by:	
Date of next review:	2 years or less from approval/last review

The Director of the Branch of origin has responsibility for the maintenance of this policy.

The General Manager of the Division of origin has responsibility for the authorisation of this policy.

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Policy statement

The Safety, Return to Work and Support Division (SRWSD) strives to maintain a constructive, empowered, productive and safe workplace free from bullying, discrimination, harassment, violence and aggression for all our employees and those who visit our workplaces and engage or partner in our services. SRWSD does not tolerate workplace bullying, discrimination or harassment.

This policy covers acceptable treatment of each other, our customers and visitors to the workplace, as well as how we should expect to be treated. It applies in all work locations, in the office or off-site; at meetings, training events, visits or work related functions such as seminars and conferences; at work related social events in and outside of work hours. It also applies to interactions via email, text messaging, internet chat rooms, instant messaging or other social media channels in and outside of work hours.

This policy supports our *Code of conduct and ethics policy* and is supported by the *Prevention of workplace bullying, discrimination and harassment guide*, the *Workplace concerns and grievance resolution policy* and the *NSW Public Sector Personnel Handbook* to enable matters to be managed promptly, impartially and justly.

The purpose of this policy is to assist in creating a positive and productive working environment that is free of bullying, discrimination and harassment.

Our commitment

Employees of the Safety, Return to Work and Support Division commit to the core public sector values of:

- Integrity
- Trust
- Service
- Accountability

Safety, Return to Work and Support Division commits to:

- providing a safe workplace for all
- ensuring people are treated fairly, with dignity and respect
- management, leadership and accountability to maintain our workplaces free from bullying, discrimination, or harassment
- providing continuing education and training for all our people
- treating all matters professionally, in confidence, and in an appropriate time frame, and
- providing people with the appropriate levels of support.

Coverage

This policy covers all people (*“defined by the Work Health Safety Legislation as workers”*) of the Safety, Return to Work and Support Division including temporary employees, casual employees, trainees/apprentices, agency temps and consultants, volunteers, professional services contractors/subcontractors and their employees, and visitors to our workplaces. The term ‘employee’ is used in this policy to reflect all people of the SRWSD.

Compliance

All SRWSD employees must comply with this *Prevention of Workplace bullying, discrimination and harassment policy*. Failure to comply with the provisions of this policy may result in disciplinary action¹. This policy and its supporting guide are supported by Work Health Safety legislation², Anti-Discrimination legislation, SRWSD policies and the *NSW Public Sector Personnel Handbook*.

Unacceptable behaviours in the workplace

Bullying, discrimination and harassment are unacceptable behaviours in our workplace. These behaviours are not appropriate and will not be tolerated. They;

- are inconsistent with the public sector values
- are potentially a breach of our *Code of conduct and ethics policy*, and
- can be unlawful.

Bullying, discrimination or harassment can have significant social, emotional, physical and financial costs for individual's experiencing these unreasonable behaviours as well as those who witness it. It can impact our business and individuals in a number of ways including:

- loss of talent, expertise and diversity in our workforce
- reduced productivity, performance and disruption of work
- reduced morale in individuals and teams, including low self-esteem and confidence
- impact on relationships with colleagues, family and friends
- individual illness or injury
- absenteeism
- cost of claims or legal action
- impact on individual career development.

Workplace violence is any action, incident or behaviour in which a person is assaulted, threatened, harmed or injured in circumstance related to their work. Incidents of workplace violence (i.e. physical assault or the threat of physical assault) will not be tolerated and should be reported to the police.

¹ Section 42 of the [Public Sector Employment and Management Act 2002](#) prescribes disciplinary action, which can be taken.

² [Work Health and Safety Act 2011](#) (WHS Act) and [Work Health and Safety Regulation 2011](#) (WHS Reg)

What are our responsibilities?

SRWSD as the Person Conducting a Business or Undertaking (PCBU³)

SRWSD as the PCBU has a duty of care under the WHS Act to ensure, as far as reasonably practicable, the health and safety of “workers”. This is through the provision and maintenance of a safe work environment, appropriate systems of work, adequate facilities, provision of training, instruction and/or supervision and the monitoring of worker’s health and conditions for the purpose of preventing illness or injury at work.

All employees:

- must recognise and meet their individual role and responsibility in contributing to a respectful and safe workplace and in doing so must **not** bully, discriminate against or harass another person
- must ensure they understand the meanings of bullying, discrimination and harassment, and what these types of behaviour might look like in the workplace, at work-related functions and activities, and in electronic mediums including social media
- must satisfactorily complete any SRWSD mandatory training when they first start with SRWSD and then again every two years
- have a responsibility to respond and/or report if they experience or observe discrimination, bullying, or harassment by utilising one of the pathways described in the *Workplace concerns and grievance resolution policy*
- may report these matters confident in the knowledge that they will not be victimised for doing so
- must ensure that they raise their concerns in good faith, believing them to be true⁴.

All people leaders:

In addition to their responsibilities as an employee, people leaders have a duty to act and apply due diligence in matters that relate to the health and safety of those they supervise and lead. These responsibilities include:

- acting as a role model of the required standards of behaviour
- ensuring people in their team complete any mandatory online training (*Maintaining a Harassment Free Office*) when they join SRWSD and then every two years
- assessing any risk to psychological health and safety using the tools available in the *Prevention of workplace bullying, discrimination and harassment guide*. This should occur at a minimum every six months or when a control is found to be ineffective or a new hazard is identified
- intervening early if they become aware of a bullying, discrimination or harassment issue, ensuring that they take accountability and manage in accordance with this policy and the *Workplace concerns and grievance resolution policy*
- maintaining an accurate record of any issues and actions taken
- ensuring there is no retaliation against employees who raise a concern or grievance or have a concern or grievance raised against them.

³ Work Health and Safety Act 2011 (WHS Act) Subdivision 2, section 5.

⁴ *Workplace concerns and grievance resolution policy* outlines actions regarding inappropriate or vexatious claims.

Bullying

What is Bullying?

Workplace bullying is **repeated** and **unreasonable** behaviour directed towards an employee or a group of employees that creates a risk to health and safety.

Repeated behaviour can be either a persistent behaviour or it can refer to a range of behaviours over a period of time.

Unreasonable behaviour means behaviour that a reasonable person, having regard for the circumstances may see as unreasonable, including behaviour that is victimising, humiliating, intimidating or threatening⁵.

Bullying behaviour in the workplace can range from the very obvious to the very subtle.

Bullying can be intentional; where the actions are intended to humiliate, offend, intimidate or distress. Bullying can also be unintentional; where the actions although not intended to humiliate, offend, intimidate or distress did, and should reasonably have been expected to cause that effect.

Bullying can be in the presence of and directed at an individual, or it can be conveyed indirectly. Bullying can be directed at a single employee or a group of employees and can be carried out by one or more employees. It can occur downward from people leaders to employees, sideways between employees, or upward from employees to people leaders.

Bullying may include:

- abusive, insulting or offensive language and comments including any act that is aggressive or intimidating
- unjustified criticism or complaints
- continuously and deliberately excluding someone from workplace activities
- withholding information that is vital for effective work performance
- setting unreasonable timelines or constantly changing deadlines
- setting tasks that are unreasonably below or beyond a person's skill level
- denying access to information, supervision, consultation or resources such that it is a detriment to the employee
- spreading misinformation or malicious rumours
- changing work arrangements, such as rosters and leave, to deliberately inconvenience a particular employee or employees
- excessive and unreasonable management scrutiny
- isolating behaviour including deliberate exclusion from work related meetings.

Bullying does not include:

- expressing differences of opinion in an appropriate manner
- conflicts, stresses and strains of normal working interaction no matter how unpleasant
- reasonable management action taken in a reasonable way
- allocating work in accordance with operational or business needs

⁵ Preventing and Responding to Workplace Bullying Code of Practice (draft) Safe Work Australia 2013

- setting reasonable performance goals and standards
- providing feedback on performance
- managing unsatisfactory performance
- exercising reasonable supervision of an employee
- reasonable and legitimate performance or behavioural counselling in the right forum and in an appropriate manner
- implementing organisational changes or restructures
- legitimate disciplinary action.

Discrimination

What is Discrimination?

Discrimination occurs when someone is treated unfairly because they belong to a particular group of people or have a particular characteristic⁶. Discrimination is any practice that makes distinctions between individuals or groups that disadvantages some people and/or advantages others.

Some types of discrimination are unlawful if they are based on the prohibited grounds (set out below), such as discrimination on the grounds of sex, race or age.

A person can unlawfully discriminate against another person even if they did not intend to do so.

What is unlawful discrimination?

It is against the law to discriminate against someone on any of these grounds:

- age
- sex, including pregnancy and breastfeeding, homosexuality and transgender
- race, nationality, ethnicity or ethno-religious origin
- disability, including physical, mental or disease (e.g. HIV or AIDS)
- carer's responsibilities
- marital or domestic status.

There are 2 forms of unlawful discrimination – direct and indirect.

Direct discrimination is when someone is treated less favourably in their employment due to one of the prohibited (unlawful) grounds set out above. For example, you don't hire someone because of their age or their race.

Indirect discrimination is when there is a requirement, condition, policy or rule which appears to be the same for everyone but has an unfair and unreasonable effect on some people because of their gender, race, disability or some other prohibited ground (set out above). For example, only employing persons of a certain height may be indirectly discriminating against females, who are on average, shorter than men.

⁶ Anti-Discrimination Board of New South Wales

Harassment

What is harassment?

Harassment is any form of unwanted behaviour which offends, humiliates or intimidates and creates a hostile environment⁷.

Harassment may occur as a single act, or as a series of incidents, persistent innuendos or threats.

Harassment does **not** have to be directed to a particular person to be unlawful. Behaviour which creates a hostile working environment for other people can also be unlawful. For example, people overhearing your conversation have a right to complain if they are offended.

It is against the law to harass a person because of their;

- sex
- pregnancy
- breastfeeding
- race (including colour, nationality, descent, ethnic or ethno-religious background)
- age
- marital or domestic status
- homosexuality (actual or perceived)
- disability (actual or perceived, past, present or future)
- transgender status (actual or perceived)
- carer's responsibilities (actual or presumed).

What is sexual harassment?

Sexual harassment occurs if a person harasses another person by:

- making an unwanted sexual advance or an unwelcome request for sexual favours; or
- engages in other unwelcome conduct of a sexual nature and in the circumstances, a reasonable person would have expected the person would be offended, humiliated or intimidated⁸. This can include remarks, looks, leers, unwanted contact or questioning.

Both men and women may be sexually harassed, by someone of the same or the opposite sex. Sexual harassment does not have to be directed at a particular individual to be unlawful.

Mutual attraction that is welcome and reciprocated between two people is not sexual harassment. Safety, Return to Work and Support Division is concerned with behaviour that adversely affects the workplace, not the private lives of our people.

⁷ Anti-Discrimination Board of New South Wales

⁸ Anti-Discrimination Board of New South Wales

Prevention of workplace bullying, discrimination and harassment

Everyone in the workplace has a responsibility for preventing bullying, discrimination and harassment. The SRWSD approach is reflected in the policies, guides, tools and activities that support creating a constructive, empowered, productive and safe workplace. SRWSD encourages early intervention in the prevention of workplace injury and illness.

Prevention in SRWSD follows a risk management process consistent with the *WHS Risk Management Procedures*, which involves the following steps:

1. identify and assess risk factors
2. manage the risk
3. review the effectiveness of control measures.

Further information regarding risk assessment and appropriate controls is available in the *Prevention of workplace bullying, discrimination and harassment guide*.

Identify and assess risk factors

Identifying the risk factors involves determining all the circumstances and situations that could potentially contribute to workplace bullying, discrimination and harassment. Indicators of possible concerns relating to these may present as:

- patterns of sick leave or staff turnover
- decline in organisational, team and individual performance
- reporting of complaints and injuries
- feedback from performance discussions or exit interviews
- trends in employee satisfaction surveys
- evidence of workplace disharmony or breakdown of working relationships.

Risk factors may be interrelated and therefore should not be considered in isolation and may be related to:

- organisational or team culture
- leadership styles
- inherent behaviours
- systems of work
- workplace relationships
- workforce characteristics.

Assessing the risk will assist in determining if adequate measures are in place to remove or reduce the risk. A risk assessment will help determine:

- the likelihood and consequences of bullying, discrimination or harassment occurring in the workplace
- actions to be taken to control the risk
- the urgency required to implement the corrective actions
- the effectiveness of existing control measures.

Manage risk

The most effective way to manage workplace bullying, discrimination and harassment is to remove the factors that cause it. Where this is not reasonably practicable, the following control measures may be used to minimise the risk:

- Manage the risks in the work environment (organisational culture, leadership styles, systems of work, workplace relationships, workforce characteristics).
- Inform and train all employees, including mandatory training.
- Resolve complaints through effective systems.

Using a combination of control measures will assist in effectively managing risk.

Review control measures

The control measures used to manage the risk should be reviewed and updated regularly to ensure effectiveness.

Management of incidents of workplace bullying, discrimination & harassment

In the management of workplace bullying, discrimination and harassment matters, all employees have a responsibility to act in accordance with the *Code of conduct and ethics policy* and uphold the *Public Sector Values*.

SRWSD provides four resolution pathways for the management of workplace bullying, discrimination or harassment, as described in the *Workplace concerns and grievance resolution policy*. They are:

- **Self Help:** where the employee attempts to resolve the workplace concern themselves.
- **Informal resolution process:** where the employee raises their concern with their people leader or People and Culture Service and Advice.
- **Formal resolution process:** where the concern is raised, in writing, with an appropriate people leader requesting the concern be managed formally. The people leader, in consultation with People and Culture, will determine if this is the appropriate pathway.
- **External avenues:** the concern may be submitted to and dealt with by an external organisation such as the Anti-Discrimination Board.

Where can I get help?

Internal

- Your people leaders
- People and Culture Service and Advice on 4321 4405 or pcs@srwsd.nsw.gov.au
- Employee Assistance Program on 1300 360 364
- Bullying Response Service on 1800 088 851
- managerAssist™ on 1300 360 364

External

- Anti-Discrimination Board of NSW on 1800 670 812
- Australian Human Rights Commission on 1300 656 419
- NSW Ombudsman on 1800 451 524

Associated documents

Policies and guides

- Prevention of workplace bullying, discrimination and harassment guide
- Code of conduct and ethics policy
- Respectful behaviours guide (WCA)
- Work health and safety policy
- WHS risk management procedures
- Workplace concerns and grievance resolution policy
- Employee support services policy (currently under review)
- Industrial dispute resolution procedure
- Information security policy

Sources of Authority

- [*Dealing with Employee Work-related Concerns and Grievances Policy and Guidelines*](#) (publications of the Public Sector Commission)
- [*Leading Well - the Role of Leadership in Improving the Prevention and Management of Psychological Injury*](#) (publications of the Public Sector Commission)
- [*Fact Sheet: Preventing and Responding to Bullying at Work*](#) (WorkCover Publication)
- [*Preventing and Responding to Workplace Bullying Draft Code of Practice*](#) (Safe Work Australia)

Awards and Conditions

- [*Crown Employees \(Public Service Conditions of Employment\) Award 2009*](#)
- [*Crown Employees \(Office of the WorkCover Authority - Inspectors 2007\) Award*](#)
- [*Public Service Commission Personnel Handbook*](#), Chapter 9 Management of Conduct and Performance

Legislation

- [*Work Health and Safety Act 2011*](#)
- [*Work Health and Safety Regulation 2011*](#)
- [*Anti-Discrimination Act 1977*](#)
- [*Public Sector Employment Management Act 2002*](#) to be replaced by the [*Government Sector Employment Act 2013*](#)
- [*Industrial Relations Act 1996*](#)

Public Service Association Answers to Parliamentary Questions on Notice

EXTERNAL MONITORING OF WORKCOVER

Response to the question taken on notice at page 20 of the transcript.

This question has been under consideration for quite a long time but it is very difficult to decide on the best way forward without being able to be informed about the political or technical practicalities of any such recommendation. The PSA would welcome any means of external oversight that affords the employees of Safety Return to Work Support Division the same kind of regulatory framework that WorkCover provides for other employees in NSW.

None-the-less significant discussion has been held with the PSA's delegates in the organisation and we have settled on the following recommendation:

- (1) *A Parliamentary Committee be given the role of permanent oversight of those government agencies that implement WHS and Workers Compensation legislation with the power to make recommendations and approve policies by which they may carry out their functions.*
- (2) *That this Parliamentary Committee oversee a WHS and Workers Compensation Office which will ensure the compliance of the WHS and Workers' Compensation regulations with respect to the employees of the Regulator.*
- (3) *The Parliamentary Committee would appoint appropriately qualified persons to carry out the full range of regulatory functions, including advice, overseeing and compliance with improvement notices and possible negotiation of enforceable undertakings within these agencies.*
- (4) *these recommendations would require that the Work Health & Safety Act 2011 and the applicable Workers Compensation legislation be amended to give effect to points (1) and (2) above.*
- (5) *It is recommended that the Parliamentary Committee, overseeing the WHS and Workers Compensation Regulators facilitate the development of internal policies that may be used by regulators as a guide to assist the implementation of WHS and Workers' Compensation legislation.*

**Public Service Association
Answers to Parliamentary Questions on Notice**

SPECIFIC ACTIONS THE COMMITTEE COULD RECOMMEND

Response to the question taken on notice at page 32 of the transcript.

The following recommendations would complement the recommendations made above about a monitoring body:

- (6) *That the WHS regulations be amended to require all PCBU's to take preventative actions to manage WHS risks, and that these regulations should include specific measures with respect to the risks of psychological injury. It is recommended that all businesses be required to have a confidential means of reporting risks of psychological injury, and of psycho-social risks and hazards.*
- (7) *It is recommended that all businesses conduct annual surveys of workers, such surveys to comply with a Code of Practice, and that there must be a Risk Control Plan that indicates what reasonably practicable risk controls will be implemented. It is recommended that businesses be required to keep records of their risk identification and risk control documentation.*

The PSA has made in our submission numerous recommendations in relation to specific actions to assist in improving the culture within WorkCover and Safety Return to Work Support Division, however the following recommendations would be seen as particularly important:

- (8) *There should be an apology made to the employees of WorkCover and the Safety Return to Work Support Division for the unsafe and unhealthy culture they have had to endure. This is the first step in assisting injured parties to move on and begin healing from the wounds they have experienced.*
- (9) *There should be a clearly stated commitment from the CEO and from the General Managers to work towards an improvement of the culture. Without an acceptance of the existence of a problem no improvement will be gained.*
- (10) *The workforce be monitored to track improvements in the area of psychological health. This would include the recommendations in our submission regarding undertaking risk identification by monitoring indicators such as absences from the workplace, forfeiture of flex time, incidence of complaints and results of employee surveys.*

- (11) *Action plans be developed, implemented and reviewed with employee input, to address the issues identified. The recommendations in our submission around introducing key performance indicators for managers relating to the psychological health of the employees they supervise, is critical in achieving this goal.*
- (12) *Policies and procedures should be systematically reviewed to make them more flexible and less punitive in nature. This should mean that compliance with the spirit of the policy is the focus over compliance with the minutiae. Performance of managers should be monitored to ensure compliance with this approach so that they focus on supporting staff to improve rather than punishing them for minor oversights or transgressions.*
- (13) *The draft policy for dealing with reports of bullying should be re-written to have a safety compliance focus. As stated in the first section above the PSA is now hopeful of some productive discussions with the agency in this regard but a clearly stated commitment to treating bullying reports as a safety risk, would be helpful towards that goal.*

**Public Service Association
Answers to Parliamentary Questions on Notice**

QUESTIONS FROM THE HON. ADAM SEARLE

- 1. Does having the multiple functions carried out by WorkCover (insurance, compliance, prosecutions) within a single body contribute to the organisation's problematic culture?*

The PSA considers that the fact that multiple functions are carried out by the one body does not of itself contribute to the cultural problems. We consider that there are good reasons to locate the functions together in the one agency. It would appear to be the skill levels of certain managers and their willingness, or otherwise, to work in a productive and constructive way that is the real problem. This could be rectified by addressing issues with the senior managers.

- 2. Does this make the organisation more difficult to manage for middle and senior managerial staff? If so, how?*

The PSA does not consider that the co-location of multiple functions makes it more difficult to manage. Managers and staff are organised so that they can specialise in particular areas. It requires only that very senior manager's work together to realise the benefits of having the functions located under the one organisation.

- 3. Should WorkCover be separated into different bodies, each charged with a discreet part or parts of its current functions? If yes, what do you suggest as being the best proposal to effect this?*

The PSA does not consider that WorkCover should be separated into different bodies. There are good synergies to be realised by having the functions located in the one organisation.

eg. WorkCover inspectors can visit a workplace and simultaneously address compliance issues in relation to workplace safety and in relation to Workers Compensation. The barrier in doing this is related to the tight time frames provided to inspectors before they must close a case and because inspectors are not encouraged to do any work outside of the safety realm.

To separate these functions requires the need to duplicate resources so that another group of inspectors be employed to visit the same workplace to look at a different compliance issue.

The PSA has been raising this particular issue for some time about utilising the inspectors better in the area of Workers Compensation compliance. This could be easily addressed with the current model and structure but there seems to be a lack of willingness by senior management to work together. This inefficient silo effect would be magnified if the functions were separated into different agencies.

4. *Given the evidence received regarding alleged interference by managers in inspectors enforcing safety laws, is there a need for some of WorkCover's functions being made statutorily and legally independent of Executive Government (similar to Police or DPP)?*

If yes, what functions and what model do you suggest?

There may be benefit in increasing the individual powers of inspectors, however it is reasonable for the judgement of any one officer to be able to be questioned. The biggest concerns arise when the inspector recommends taking the matter further and this decision is overruled by someone who has not been to the worksite to see the issues first hand; though there is an acknowledgement that with limited resources there may be the need to focus efforts strategically rather than pursuing each individual matter.

The PSA has raised on numerous occasions the issue of managers directing inspectors to withdraw notices, or removing the inspector to replace with another when the PCBU complains. There are issues about managers having interactions with PCBUs and then instructing the inspector to close the case. The interactions of managers do not appear to be recorded in the same transparent fashion that the inspector's actions are recorded.

A strengthening of inspector powers may be useful in moving to a model where the inspector should be involved in any decision-making process subsequent to making their recommendations. The PSA does not wish to make recommendations on a specific model for doing so.

Any effort which goes to increasing the involvement of inspectors in decision-making and in focussing on accurate record-keeping to ensure transparency of decision-making processes would be welcomed.