

5 June 2025

Dear [REDACTED],

I appreciate the chance to contribute to this consultation on psychosocial hazards in Queensland's resources industry.

In a recent court decision, the presiding member when referring to a potential Queensland coal mine development noted:

"This coal is a public resource, owned by the State, to be exploited, or not, for the public good."

This statement reminds me of a foundational truth of Queensland's resources framework: the minerals, including coal, being extracted from Queensland are not private property, but public assets. The privilege to mine them exists only under the condition that it serves the public interest, and this includes ensuring the safety and wellbeing of the workers who make that extraction possible.

Safety and health are not side issues in this extraction; they form part of the legal basis to allow it. The Coal Mining Safety and Health Act 1999 (CMSHA) requires mining operations only occur when risks to workers' safety and health remain at acceptable levels. This requirement includes psychosocial health, which matters as much as physical health.

Many individuals I have spoken to assume the term 'psychosocial' to simply be a reference to mental health. Without a clear standard, controls, and education around psychosocial risk, it is likely to continue that companies and workers think it is acceptable to manage psychosocial risks with symbolic gestures like R U OK cupcake mornings or generic referrals to an Employee Assistance Program. This becomes misleading when a company creates or worsens psychosocial hazards through poor leadership or policies, then claims compliance by offering superficial or reactive support – all because there lacked a clear standard for industry to meet.

I believe the most effective control is good leadership—practical, consistent, and grounded in respect. It means clear communication about the issues that impact workers daily such as safe and appropriate working conditions, machines that are fit for the job, access to call loved ones during long shifts, career progression, and a genuine sense of autonomy and agency at work. These are not perks; they show respect in action and they are essential to any system that manages psychosocial risks.

Respect may not count as a formal "control," but it forms the cultural and behavioural foundation for successful psychosocial risk management. Without respect, even well-designed risk controls will likely fail during implementation and win little worker acceptance. Without respect, workers cannot trust, feel mentally safe, or participate meaningfully in safety systems. Respect lets workers speak up, question decisions, contribute to solutions, and expect fair treatment—core elements of any credible risk-control framework.

I have more than six years of operational experience in both hard-rock and coal mining in Queensland. During that time, I talked with over 500 mining workers and had hundreds of conversations specifically about psychological health and safety in mining. I currently serve as the elected Site Safety and Health Representative (SSHR) at the Commodore Mine.

Based on that experience, I offer my perspectives in response to Sections 5.0 to 7.0 of the attached consultation paper.

Sincerely,

Ms Holly Grofski
Site Safety and Health Representative – Commodore Mine

Section 5.0: Managing the risk of psychosocial hazards

Question: Would this option be effective in clarifying what psychosocial hazards and psychosocial risks are within Queensland's resources safety and health regulations?

Response: I support the proposed clauses that define psychosocial hazards and risks while also assigning clear responsibility for managing them in the Safety and Health Management System (SHMS). These clauses acknowledge that psychological harm is a real work health risk and that we must consult with workers to create effective controls.

To make these rules clear and enforceable, I recommend that the legislation or its regulations:

- Adopt or reference a recognised standard under section 37 of the Coal Mining Safety and Health Act 1999, such as Safe Work Australia's Model Code of Practice: Managing Psychosocial Hazards at Work (2022).
- Or develop a new, dedicated Recognised Standard for psychosocial hazards, with an emended risk score on certain immovable hazards in mining.

Either option would give everyone—duty holders, RSHQ inspectors, and workers—a detailed, evidence-based list of common psychosocial hazards that matches national guidance.

It would also support RSHQ inspectors and workers in identifying and responding to psychosocial risks using a shared, recognised framework.

Without a recognised standard, companies will interpret broad definitions in different ways across mine sites. That leads to uneven application, weak legal certainty, and poor risk control—undermining the whole point of our safety laws. We saw this happen with respirable dust. Before we had a standard, dust limits and controls were vague, inconsistently enforced, and hard to check. When regulators finally required pressurised cabins with verifiable monitoring data, everyone gained clarity, accountability, and a clear benchmark.

We need the same clarity for psychosocial hazards. Even though we can't monitor psychosocial health in real time the way we monitor cabin pressure, that doesn't justify not measuring. We can start with a straightforward, clinically proven tool—like the free Australian Government People at Work survey—to gather consistent data. We don't need perfect tools right away. We need something to start measuring, and then we can improve over time. As an alternative, RSHQ could develop an industry-specific survey that meets the same standards as People at Work.

Mandating the use of the People at Work survey would enable:

- Establish baseline benchmarks for psychosocial conditions on each site.
- Report publicly on the psychosocial health of the workforce on publicly owned resources.
- Give regulators insight into site-level conditions and spot systemic risk trends.

Importantly, employers should not be permitted to design or run their own internal surveys in order to comply. Workers do not trust that these surveys are anonymous, and as such, participation will be skewed, limiting validity of data. Likewise, mandating the use of third-party survey providers risks data manipulation—whether through the identification of individuals resulting in mistrust or alteration of measurement scales to produce more favourable results.

A free, standardised, mandatory, government-backed survey provides the neutrality, data integrity, and consistency we need. If we pair that survey with clear legislative definitions and a recognised standard, we

would build a credible, enforceable framework for managing psychosocial risks—just as we already do for dust, noise, and other measurable hazards. Similar to the coal board medical check-up, only every six months.

Section 6.0: Psychosocial risk controls

Question 1: Are existing obligations sufficient for controlling psychosocial risks to as low as reasonably achievable?

Response: No. Current rules do not go far enough to keep psychosocial risks under control.

Question 2: Would amendments to specify factors to consider when implementing psychosocial risk controls assist in achieving more effective risk management?

Response: Yes, I strongly support this proposed amendment.

Specifying the factors that must be considered when implementing psychosocial risk controls will materially improve the consistency, quality, and enforceability of psychosocial risk management across the Queensland resources sector. This mirrors the proven value of section 55D of the *Work Health and Safety Regulation 2011 (Qld)*, which requires consideration of key elements like exposure severity and frequency, systems of work, and environmental and behavioural contributors to psychosocial harm.

Currently, psychosocial risk management in mining is highly variable (if at all) and often superficial, or is considered one in the same under the concept of ‘mental health’ with the burden of the risk and problem on the individuals, rather than the work systems surrounding the individual daily. By mandating consideration of specific factors, such as:

- The duration, frequency, and severity of exposure,
- Interaction of multiple hazards,
- Design and layout of work and accommodation environments,
- And the quality of information, training, and supervision,

the regulatory framework will consistently educate and promote structured, risk-based approaches to control selection and evaluation.

This will help address real-world findings from RSHQ’s own regulatory activity, which shows that many sites do not properly address exposure characteristics or compounding psychosocial factors. It also aligns with current safety law principles, particularly the *Coal Mining Safety and Health Act 1999*, where an acceptable level of risk must be achieved having regard to all relevant factors, including the interaction between hazards (*CMSHA s.18*).

Additionally, requiring consideration of these factors will:

- Encourage authentic workforce consultation, as workers are best placed to describe exposure frequency, severity, and system design issues;
- Support compliance assessments by inspectors, who will have a clear checklist of required risk factors to evaluate; and
- Drive proactive, prevention-focused controls, rather than reactive administrative responses like post-incident referrals to EAPs.

Question 3: Would amendments to include the hierarchy of controls for managing psychosocial risks assist in achieving more effective risk management?

Response: Yes, I fully support the inclusion of a hierarchy of controls for managing psychosocial risks.

Introducing a defined psychosocial hierarchy of controls into the resources safety and health regulations would be a meaningful step toward ensuring structured, risk-based, and transparent control selection to a newly acknowledged category of risk. It would bring psychosocial risk management in line with established principles already used for physical hazards across the Queensland mining and quarrying sector under the *MQSHR*, and in certain CMSHA-recognised standards.

Applying the hierarchy of controls to psychosocial risks would help reframe current practice (where it exists) which too often defaults to low-level administrative controls, such as generic policies or cure-all referrals to Employee Assistance Programs (EAPs). This occurs without proper consideration of higher-order, preventative measures that may be reasonably practicable in the circumstances.

An example of ineffective control is referring a worker to an EAP to address psychological distress caused and compounded every day by the employer's repeated failure to provide a clear pathway for training or career advancement. In such cases, the EAP functions as a reactive coping mechanism or a tick-and-flick administrative measure, aimed at superficially fulfilling duty of care obligations, rather than serving as a meaningful psychosocial risk control. In contrast, an effective control would be clear, consistent communication about training opportunities and career pathways, empowering workers with information and allowing them to have agency to make informed decisions about their professional development and employment. This not only reduces uncertainty and frustration but also fosters engagement, trust, and worker's autonomy.

Failing to address the root cause—such as obstructed career progression, poor leadership, or unclear organisational frameworks—misses a critical opportunity to prevent harm, injury, or distress. These are systemic organisational failures, not individual weaknesses to be treated through counselling alone.

This illustrates why a mandated psychosocial hierarchy of controls would be transformative. It would **shift the focus** from managing the symptoms of psychological harm to addressing their underlying causes. It would also enhance the quality of workforce consultation and compel obligation holders to consider whether higher-order, preventative measures—such as job redesign, clearer career structures, or organisational change—are reasonably practicable. This is precisely the approach already required for physical risks, and it should now be extended to psychosocial risks to achieve parity in worker protection and in the mind of those conducting the risk assessments.

Additionally:

Mining environments present a unique set of inherent and embedded psychosocial hazards that cannot be fully eliminated, regardless of the controls applied. These hazards are structural, arising from the physical, operational, and geographic characteristics of mine work, including:

- Remote or isolated worksites
- Long, fatiguing rosters (e.g. 12-hour shifts, FIFO/DIDO)
- Extended time away from family or community
- High-risk tasks under sustained production pressure
- Limited on-site amenities and restricted personal connectivity

- Exposure to serious incidents, injuries, or fatalities

These embedded hazards should be **explicitly acknowledged in a dedicated Recognised Standard** developed under section 37 of the *Coal Mining Safety and Health Act 1999* (CMSHA) to avoid the watering down of the hazards' risks. That standard should:

1. Clearly define psychosocial hazards—by adopting the comprehensive list set out in Safe Work Australia's *Model Code of Practice: Managing Psychosocial Hazards at Work (2022)*, and
2. Set a baseline permanent medium risk score for the industry embedded hazards, correctly and appropriately forcing risk assessors to look at other hazards with the increased exponential risk they carry, due to the embedded hazards constant presence.
3. Mandate the application of a psychosocial hierarchy of controls, adapted for the resources context.

Even when mitigated, such as through the provision of private phone-friendly amenities to allow daily contact with loved ones during a work shift to combat the remoteness of the work site, some psychosocial risks can only be reduced from high to medium, not to low. This is not a failure, but a reflection of reality. To suggest that such structural hazards such as 'remote location' can be assessed as 'low' risk merely because a company policy has been drafted and exists to 'control' the risk, within a digital SHMS is disingenuous and undermines the credibility of the entire risk management process.

Regulatory guidance must clarify that the objective is not the elimination of all risk, but the achievement of an acceptable level of risk, consistent with the *Coal Mining Safety and Health Act 1999* (CMSHA). This framing would reinforce the need for honest assessments, realistic control measures, and continuous improvement, especially in managing psychosocial risks that are persistent and embedded in the nature of mine work.

With some psychosocial hazards unable to be eliminated, this makes it all the more important to apply stronger controls to other, avoidable psychosocial hazards, including:

- Poor leadership and organisational justice
- Bullying or interpersonal conflict
- Obstructed career development
- Overly restrictive or inconsistent access to communication tools
- Lack of recognition

This approach strengthens psychosocial risk management by:

- Requiring the elimination or minimisation of hazards that *can* be controlled, to compensate for those that cannot;
- Encouraging higher-order preventative controls—such as role redesign, improved facilities, or more equitable job planning;
- Supporting more meaningful workforce consultation, where workers help identify persistent stressors and propose viable solutions.

Establishing a recognised standard that incorporates the psychosocial hierarchy of controls and a clear, nationally aligned list of hazards would provide:

- A structured benchmark for RSHQ inspections and compliance audits;

- A basis for clear and consistent SSE decision-making under the SHMS; and
- A transparent expectation framework for workers to understand how their safety and health is being protected.

This is consistent with section 26A obligations of site senior executives, with the CMSHA objective to maintain risk at an acceptable level, and with national WHS principles already in force across other sectors. As with respirable dust, where clear recognised standards enabled measurable, enforceable protection, the same must now occur for psychosocial risk.

Section 7.9: Reporting obligations

Question 3: Do you support amendments to Queensland’s mining legislation to require periodical reporting of exposure to traumatic events, bullying and harassment (incl. sexual harassment)?

Response: Where a suicide occurs, the default position should be that both work and personal factors are likely contributors. The deceased cannot speak for themselves, and it is neither appropriate nor realistic to isolate causation to a single factor, let alone assume work was not a factor. There have been instances of suicides in Queensland mining occurring shortly after a worker has been stood down by their employer. While pre-existing psychological vulnerability may be present, the act of being stood down—particularly where there is no clarity about the reason, the duration, procedural fairness, or reputational impact—can compound stress, uncertainty, and distress in a way that makes work a proximate contributing factor.

These situations show how small management actions can interact with a worker’s existing vulnerabilities and create a crisis. When multiple minor stressors pile up or go unaddressed, the overall risk can skyrocket. Because of this, we should assume work factors played at least a small role in every suicide and report them fully—while protecting privacy and treating families and colleagues with respect.

Further alignment with Safe Work Australia’s proposed amendments—including mandatory reporting of suicides, violent incidents, and periodic reporting of exposure to traumatic events, bullying, and sexual harassment—would help ensure that psychosocial harm is recognised and treated with the appropriate seriousness and transparency. Doing so would reinforce the shared responsibility to protect psychological health as an integral part of workplace safety.

However, these incident-based obligations, while essential, are necessarily reactive. They capture harm only after it has occurred.

As set out in my response to Section 5.0, I believe there is also a need for structured, preventative data reporting to support early identification and mitigation of psychosocial risks. Specifically, I recommend that:

- Every mine site in Queensland be required to administer the People at Work psychosocial risk survey (or a RSHQ standardised equivalent) twice annually,
- The survey be conducted during paid work time (e.g. one hour per worker, every six months),
- An aggregate site-level report and company analysis of findings be submitted to RSHQ, including intended control measures linked to identified risk factors, and
- RSHQ publish anonymised, de-identified trend data to inform industry-wide understanding and regulatory targeting.

Pairing mandatory incident reporting with these biannual surveys gives regulators and companies both a retrospective view (what already happened) and a predictive signal (what might go wrong). Together, these data streams let us follow the safety laws' goal: promote reliable, evidence-based practices and keep psychosocial risks at an acceptable level.

Conclusion

The management of psychosocial hazards represents one of the most powerful opportunities for transformation in Queensland's resources industry, not just in improving individual wellbeing, but in driving safer, fairer, and more accountable leadership across publicly owned resources.

When psychosocial risk is properly understood, not as a vague or intangible concept but as a structured, assessable workplace exposure, it becomes possible to manage it with the same rigour and accountability applied to physical risks. This will only occur if industry is provided with, and required to use, a clear and enforceable standard.

A dedicated Recognised Standard, aligned with national best practice, incorporating the hierarchy of controls, and supported by robust and transparent reporting obligations, is essential to achieve this. It will provide duty holders, workers, and regulators with a shared language, clear benchmarks, and legal clarity.

In parallel, regular site-level psychosocial risk assessments using standardised tools will enable early detection and mitigation, supporting a culture of prevention rather than reaction. Critically, workers must be educated, empowered, and confident to engage in this system, knowing that psychosocial harm will be treated seriously and that leadership is accountable for both the hazards it controls and those it creates.

Without these tools—recognised standard, data gathering and analysis, and persistent education—psychosocial harm will remain an under-reported, inconsistently managed risk. With them, Queensland has a unique opportunity to lead nationally by setting a benchmark for how psychological health can be protected in even the most demanding work environments.

Psychosocial category of hazards and controls must not be seen as a bureaucratic burden or a discretionary initiative with vague obligations. It is a public duty owed to the workers who extract the state's resources on behalf of all Queenslanders. I believe fulfilling this duty, and transparently reporting on its achievement to the public, requires enforceable a clear standard, measurable obligations, and visible accountability.