

Anonymous submission #1

This response is **an individual submission**

I would like this submission to be **published and listed as anonymous on RSHQ's consultation webpage**

Chapter 4 - Protecting workers from psychological harm

Mines and Quarries - Option 1: Would this option be effective in clarifying that health includes both physical and psychological health?

Support clarifying that health includes both physical and psychological health

Chapter 5 - Managing the risks of psychosocial hazards

Mines, quarries, petroleum and gas - Option 1: Would this option be effective in clarifying what psychosocial hazards and psychosocial risks are within Queensland's resources safety and health regulations?

Yes this would be beneficial but the definitions shown in the consultation paper should not be adopted. the statement that "RSHQ does not view psychosocial hazards to be fundamentally different in nature across Queensland's resources industry compared to general workplaces" should be reviewed as this is fundamentally incorrect. The mining and petroleum industries have an elevated level of underlying psychosocial hazards that other workplaces do not have. Remote work, Shift work, Accommodation and commute arrangements are inherent factors for mining and petroleum operations that can not be altered in all instances. the definitions should not be taken from the WHS Regulations. the definitions of what constitutes a psychosocial hazard and risk must be specific for industry to prevent the inability to conduct operations.

Chapter 6: Psychosocial risk controls

Mines, quarries, petroleum and gas - Option 1: Are existing obligations sufficient for controlling psychosocial risks to as low as reasonably achievable?

Existing risk management frameworks should be used to manage psychosocial hazard/risks

Mines, quarries, petroleum and gas - Option 2: Would amendments to specify factors to consider when implementing psychosocial risk controls assist in achieving more effective risk management?

Should not be adopted. the RSHQ operations are too unique to have a "one size fits all" approach. Should follow the risk based legislation for obligation holders to develop and implement risk management systems that are suitable for the nature of the operation. An exploration site is different to a construction/shut down operation which is different from an Open cut/UG mine which is different from a rehabilitation mine.

A downturn/change in commodity prices and impending closure elevate psychosocial hazards and risks and should be managed using site risk principles

Mines, quarries, petroleum and gas - Option 3: Would amendments to include the hierarchy of controls for managing psychosocial risks assist in achieving more effective risk management?

Absolutely not. This is the worst option proposed.

The inherent nature of mining operations, remoteness, extended rosters, nature of work, accommodation arrangements results in elevated psychosocial risks depending on the location. The introduction of a hierarchy of controls would not achieve the desired outcomes and would not be suitable for most operations

Chapter 7: Reporting obligations

Mines, quarries, petroleum and gas - Option 1: Would updating SSE reporting obligations guidance material to inform Queensland's resources industry on psychosocial reporting requirements provide more clarity on reporting obligations? If supportive, provide examples of what would be helpful to clarify.

Not supportive of this requirement.

The nature of psychosocial hazards where they cannot be consistently or accurately measured and may involve multiple factors which take time to be investigated must be considered. Unsubstantiated claims should not be reported until they can be investigated and reported. If a worker makes a claim of bullying/harassment/discrimination and it is reported before being investigated that will result in prejudicial outcomes of a site.

If a death could be definitively linked to the workplace it should be reported then.

Mines, quarries, petroleum and gas - Option 2: Do you support the introduction (P&G), clarification (mines and quarries) and use of the RSHQ CEO power to require statistical information relating to exposure to psychosocial hazards? Why/why not? If supportive, what statistical information would be reasonable to request?

Statistical information could be useful but it would have to be retrospective (6 or 12 monthly) and include several elements specifically:

of events reported

of events investigated that were confirmed/substantiated.

If the statistics only show events that were reported without amending them if they were not substantiated the data will skew to indicate a higher than normal risk that is not correct.

Mines, quarries, petroleum and gas - Option 3: Do you support amendments to Queensland's mining and P&G legislation to require periodical reporting of exposure to traumatic events, bullying and harassment (incl. sexual harassment)?

Statistical information could be useful but it would have to be retrospective (6 or 12 monthly) and include several elements specifically:

of events reported

of events investigated that were confirmed/substantiated.

If the statistics only show events that were reported without amending them if they were not substantiated the data will skew to indicate a higher than normal risk that is not correct.

Mines and quarries - Option 1: Do you support removing the requirement to provide names of witnesses or persons present to Industry Safety and Health Representatives and District Workers' Representatives for high potential incidents involving psychosocial hazards?

Yes,

Any events should be redacted to all non-statutory parties. Additionally, the powers of SSHR/ISHR

under the CMSHA/MMSHA should be amended to ensure that they can't then use those powers to compel the SSE to produce records to allow for the information to be reviewed on site at a later date.