

19 September 2022

The Treasury
Langton Cres
Parkes ACT 2600

Via email to SkillsBoost@treasury.gov.au

Submission to: *Skills and Training Boost* exposure draft legislation consultation

The Australian Institute of Health and Safety (AIHS) welcomes the opportunity to provide a submission to the Treasury consultation to introduce a Skills and Training Boost to support small businesses to train and upskill their employees.

About us

We are the peak body for work health and safety (WHS) professionals and practitioners across Australia. We have approximately 4,000 individual members nationally, and active Branches in every state and territory. Formerly the Safety Institute of Australia, since 1947 we have been the voice of the WHS profession on policy and regulatory matters.

Why are we making a submission?

Our submission is made largely on two key points:

1. Workers in small to medium-sized enterprises (SMEs) experience proportionally greater harm than those working in larger organisations. This is both in terms of the frequency of incidents, and the degree of severity of injuries and disease. Fatalities are more likely to occur, as a proportion of hours worked, in SMEs than in larger organisations. A key aspect of this are SME stakeholders having less access to in-house or external WHS specialist support, and being less likely to receive effective and suitable WHS training that supports them in their work.
2. Facilitating or delivering training, being the transfer of knowledge and skills via courses, instruction or practical training, is a key method through which employers discharge their duties to manage a healthy and safe workplace that complies with WHS legislation. Training forms a core component of many regulatory requirements (e.g. high risk work licenses).

If more workers in SMEs contexts received more and effective WHS training, we would expect a reduction in rates of WHS injuries and disease across the economy. These workers will be better equipped to do their jobs safer, armed with the right knowledge and the latest information to make better decisions. Better WHS outcomes means less unplanned time away from work, less strain on the health system, and greater productivity for them, their employer and the broader economy.

We also believe that safer and healthier SMEs are more likely to be more profitable and sustainable. The WHS profession knows that when health and safety incidents are occurring, these events often occur beside operational inefficiencies and delays, inferior quality products and services, and poorer financial outcomes.

Thus this policy is of significant interest to us, the WHS profession, and the broader WHS community.

Our submission

This policy echoes measures from previous years such as the Training Guarantee scheme¹ in the early 1990s. As with all policy measures, we encourage officials to review the analysis of historical schemes like the Training Guarantee scheme in order to mitigate risks to this Skills and Training Boost policy.

We caution that the 30 June 2024 timeframe may lead to 'last minute' decisions being made just prior to the deadline. This rush will increase the likelihood of workers receiving less appropriate and valuable training, to both them and their employer. For example, we would be very disappointed to see employers hastily arrange for workers to do 'how to lift training' for manual handling tasks where the proof of efficacy is poor².

Training courses should be needs-based and selected to address both workers' and employer skills gaps. The training should also assist both parties to meet the future needs of the business and workers' roles. Thinking about and finding the right training courses for workers takes time. Therefore we encourage policy owners to consider extending this 30 June 2024 deadline.

We encourage Treasury and/or associated Departmental policy implementation teams to source/develop and provide to industry for free simple training needs analysis (TNA) tools (e.g. documentation or templates). A simple TNA can consist of several targeted questions, which would help stakeholders better understand their skills gaps and training needs.

We would welcome the opportunity to assist the policy implementation team to develop skills gap analyses materials for SMEs in relation to WHS. For example, we can quickly collate lists of WHS Units, focusing on Certificate II, III and IV in WHS qualifications. We could provide lists of relevant units of competency. A quick guide on how employers can use this subsidy to improve health and safety in their workplace will be valuable for time-poor SME decision-makers.

We also encourage policy teams to develop a simple information document for SME stakeholders on how to use the subsidy. As always with time-poor, SME-based decision-makers, simple case studies and examples that are similar to their context would also be useful.

Promotional and information documentation should help SMEs to ask potential registered training organisations (RTOs) the right questions, such as:

1. What are the learning outcomes of this training courses?

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<https://www.voced.edu.au/content/ngv%3A18958#:~:text=In%201990%2C%20the%20Australian%20government%20implemented%20an%20employer,publicity%20about%20its%20impact%2C%20particularly%20on%20small%20business.>

2 <https://www.safework.nsw.gov.au/resource-library/hazardous-manual-tasks/hwsa-position-on-how-to-lift-training>

2. How will the course help my workplace?
3. What is your experience with my industry and my organisation's skills needs?

We want SMEs to make the investment in their people count.

The potential impact from this policy on national WHS outcomes is significant. For the reasons highlighted above, we encourage policy implementers to not underestimate this impact and the flow-on benefits (e.g. reduction in burden on health system, greater productivity), and to consider making WHS training a dedicated focus of this policy. For example, a WHS training course could be used as one of the case studies or examples in promotion and information materials referred to above.

Workers from culturally and linguistically diverse (CALD) backgrounds also experience greater rates of harm in Australian workplaces. We therefore encourage policy teams to consider multi-lingual and visual communication media in promoting and explaining the policy.

Conclusion

1. SME workers are more likely to experience greater rates of harm in their workplace. Effective, suitable WHS training is a key way in which duty-holders meet their obligations, and WHS outcomes can be improved. This policy therefore represents a significant opportunity to improve national WHS outcomes.
2. Audience-appropriate information documents, TNA support materials, and examples of questions for RTOs, all of which consider time-poor and CALD SME stakeholders, would increase the uptake and effectiveness of the policy. We are available to work with policy implementers to source/develop these and other materials.
3. TNA processes can take time. We encourage the policy team to consider extending the 30 June 2024 deadline to allow for more planned, targeted and valuable training to occur.
4. We encourage the policy team to not underestimate the potentially significant positive impacts on WHS outcomes of this policy, and to consider making WHS training a dedicated focus of communication materials.

For more information about this submission please contact me at policy@aihs.org.au.

Yours sincerely,



Andrew Heinrichs

AIHS Policy Committee Chair