Australian Government
Comcare

INSPECTOR REPORT

COMCARE REFERENCE	MC00010106		**Report No.**	1
PCBU DETAILS	**Name**	Great Barrier Reef Marine Park Authority		
	Address	280 Flinders Street, TOWNSVILLE QLD		
	ABN	12949356885		
REPORT ISSUED TO	**Name**	Mr Josh Thomas		
	Position	Chief Executive Officer		
COPY OF REPORT GIVEN TO	**Name**	-		
	Position	-		
RELEVANT WORKPLACE/S OR WORKSITE	**Name**	Great Barrier Reef Marine Park Authority		
	Address	280 Flinders Street, TOWNSVILLE QLD		
	Date	23-24 May 2019		
OTHER PERSONS ATTENDING WITH INSPECTOR	**Name**	s47F s47F		
	Position	Senior Inspectors		

PURPOSE OF INSPECTION

1. The purpose of the Inspection is to assess compliance with the *Work Health and Safety Act 2011 (Cth)* (WHS Act) and *Work Health and Safety Regulations 2011 (Cth)* (WHS Regulations) in relation to the notified concerns.
2. In March and April 2019 Comcare received allegations relating to psychosocial health and workplace bullying from six (6) Great Barrier Reef Marine Park Authority (GBRMPA) workers in Townsville, Queensland.
3. An Inspection (the Inspection) in relation to the concerns commenced on 29 April 2019.

OUTCOMES

4. Based on the review of the information made available in the conduct of the Inspection, the Inspector formed a reasonable belief that the Great Barrier Reef Marine Park Authority did not comply with their duties under the WHS Act/Regulations.
5. GBRMPA has contravened the section 19(3)(c) of the WHS Act - the provision and maintenance of safe systems of work and section 35 of the WHS Regulations – managing risks to health and safety.
6. It appears that GBRMPA has not implemented a safe system of work to control psychosocial risk at the workplace. In doing so, GBRMPA has failed to manage risks to health and safety arising from the business or undertaking by eliminating or minimising exposure to psychosocial hazards.

7. From the responses provided by workers, the Inspector reasonably believes that GBRMPA workers are at risk of injury or illness due to exposure to the following psychosocial factors as detailed in the Safe Work Australia work-related psychological health and safety, national guidance material:

   a. Poor workplace relationships

   b. Low role clarity

   c. High job demands

   d. Poor organisational change management and

   e. Poor organisational justice

Corrective actions

8. The following corrective actions are outlined for the PCBU to consider:

   a. Identify psychosocial hazards in the workplace in accordance with WHS Regulation 34. Due to the nature of the concerns raised by workers, consideration should be given to engaging a competent person, such as an organisational psychologist, to review psychosocial risks within the organisation including the psychosocial risk factors identified at paragraph 7 of this report.

   b. Manage risks to health and safety arising from psychosocial risks in the workplace in accordance with WHS Regulation 35.

   c. Implement any risk controls identified in points a. and b. above, to eliminate, and if not reasonably practicable, minimise the risks to health and safety, so far as is reasonably practicable, in accordance with WHS Regulations 35 and 36.

   d. Ensure that the controls implemented at point c. are maintained and reviewed in accordance with the WHS Regulations 37 and 38. Consideration could be given to the use of the 'People at Work' package or similar, to monitor and review ongoing psychological health of the workplace.

   e. Review and update the bullying and harassment policy and procedure with consideration to the Safe Work Australia document 'Guide for Prevention and Responding to Workplace Bullying'. The review should also include:

      - Updates to definitions and legislation identified in the documents.
      - For formal complaints include: specific timeframes and accountabilities, a mechanism for ongoing feedback and an appeals process. In addition, refining and clarifying the informal and formal processes to be followed.
      - Consider the role of the organisation: to train management to be able to respond and fulfil their responsibilities, to provide access to an Employee Assistance Program or similar assistance and to provide information as required.
      - Consider training provided to managers to ensure they are capable of complying with the principles of procedural fairness, as detailed in paragraph 23 of the procedure.
      - It may be useful to include a flowchart depicting the organisation's response to workplace bullying in the procedure.
      - Consider including alternate reporting lines for complaints.

   f. As identified by GBRMPA representatives, complete and implement the WHS Manual currently being produced.

9. Assistance to address the matters identified can be located in following documents available from Safe Work Australia:

   a. How to manage work health and safety risks – Code of Practice.

   b. Work-related psychological health and safety: A systematic approach to meeting your duties – guidance document.

   c. Guide for preventing and responding to workplace bullying – guidance document.

10. GBRMPA must ensure that the duties relating to WHS regulations 37 and 38 are met in relation to both interim and ongoing controls:

    a. Risks are either eliminated, and if not possible to do so, are reduced so far as reasonably practicable.

    b. The controls are effective, in place, and used.

    c. Where relevant the lessons are applied across the organisation.

11. Comcare would like to acknowledge the following: the limitations and challenges in dealing with anonymous complaints, the challenges faced by GBRMPA in dealing with historical matters particularly the perception of matters being raised and not addressed and that GBRMPA have advised that they are in the process of producing a WHS Manual.

12. Comcare will conduct a verification inspection to verify completion of the actions identified within the corrective action plan identified at paragraph 8 and to confirm that the duties outlined in paragraph 5 are met including, but not limited to, ensuring that the expected WHS results are achieved.

ACTIONS AND OBSERVATIONS

13. Comcare initially received contact from six (6) complainants, all of whom requested to remain anonymous. Three of these complainants then provided additional written information to Comcare.

14. On 29 April 2019 Comcare commenced an Inspection to enquire into the circumstances surrounding the complaints. Comcare Director, Regional Operations Queensland, Ms s47F contacted GBRMPA Chief Executive Officer (CEO) Mr Josh Thomas to advise of the Inspection and arrange a meeting.

15. On 23 May 2019 Inspectors s47F and s47F attended the GBRMPA Townsville office, through voluntary agreement, in the conduct of the announced inspection. Inspectors met with Mr Thomas, Director Legal Services s47F and Senior Legal Officer s47F . GBRMPA representatives supplied copies of policies and procedures to Inspectors at the meeting.

16. Inspectors s47F s47F and s47F then conducted briefing sessions with workers to advise of the survey, the purpose, how it would be conducted, confidentiality, the systems approach utilised by Comcare including that no investigation of individuals will be undertaken and referrals to other agencies for individual complaints. Inspectors then conducted surveys with workers on 23 and 24 May 2019.

17. On 24 May 2019 Inspectors s47F and s47F spoke with General Manager Corporate Services s47F , accompanied by WHS Contractor s47F . s47F provided Inspectors with an

overview of the Corporate Services Branch, the changes and challenges of the GBRMPA moving to an APS agency.

18. On conclusion of the surveys, Inspectors met with Mr Thomas and s47F to discuss the survey and provide an overview of the survey results. Discussion included initial themes identified, indicators of levels of risk from psychosocial hazards, historical concerns from matters not being addressed and the collation of information from surveys and next steps.

19. Following the site visit, the documents supplied by GBRMPA were reviewed and additional documentation and information requested. The information was subsequently supplied by s47F and were reviewed by the Inspector.

Findings

20. The following findings are made against section 19 of the WHS Act – Primary Duty of Care:

    a. GBRMPA is a person conducting a business of undertaking (PCBU).

    b. Staff members involved were GBRMPA workers.

    c. There is a risk to worker's health and safety.

    d. GBRMPA has not taken all reasonably practicable steps to control the risk to worker's health and safety.

Reasons for Findings

21. GBRMPA is a 'PCBU' as defined under section 5 of the WHS Act. GBRMPA is a PCBU under the Comcare scheme.

22. Staff members were 'workers' as defined under section 7 of the WHS Act.

23. Workers were in a 'workplace' as defined under section 8 of the WHS Act, at the GBRMPA corporate offices in Townsville, Queensland.

24. Following the site visit by Inspectors, the documents supplied were reviewed. The information below describes matters identified in the course of the inspection.

25. Risk assessment – GBRMPA provided a 'Risk Assessment and Management Plan (RAMP) which includes a risk identified as 'Workers may be seriously harmed (including psychosocial) or may die when undertaking activities sanction by the Authority'. This overarching risk statement does not adequately investigate psychosocial risk, controls and their effectiveness. GBRMPA has not provided evidence of having conducted a risk assessment in relation to psychosocial risks impacting workers.

26. Document review and review of controls – GBRMPA provided the Internal Policy and Procedure for Bullying and Harassment. Both of the documents were last reviewed on 6 January 2014 with a review date of 6 January 2016, this review does not appear to have been conducted. As a result of these details it appears that the policy, procedure and controls implemented in relation to psychosocial risks have not been reviewed.

27. Procedure review – GBRMPA provided the Internal Policy and Procedure for Bullying and Harassment. These documents do not provide for alternate reporting lines for complaints, and also rely on managers and supervisors to manage the process. Clarification may be required in relation to point 14 which states, 'It is acknowledged that not all bullying and harassment matters warrant or require a formal complaint. Also, the respondent may not want the procedure dealt with formally', with regard to how this would apply.

28. From the above information, the Inspector reasonably believes the GBRMPA has not implemented a safe system of work to control psychosocial risk at the workplace and in doing so has failed to manage risks to psychological health and safety arising from the business or undertaking by eliminating or minimising exposure to psychosocial hazards so far as is reasonably practicable.

29. Additionally, information supplied by workers who participated in the survey and the observations of Inspectors when conducting the survey indicates that the controls in place at the current time are not effectively managing psychosocial risks.

Survey Results and Themes

30. Following the conduct of the voluntary confidential survey with a sample of workers, the details were consolidated, and themes identified. The results were as follows:

    a. All workers surveyed were aware of procedures for performance management, WHS, bulling and harassment.

    b. All respondents were aware of policies and procedures relating to: WHS, Performance Standards/Performance Management, and Bullying and Harassment. They were also aware of where/how to find them, with most respondents having accessed them.

    c. Most respondents had a current position description, which they believed that they have clear accountabilities and responsibilities.

    d. All respondents had participated in the Performance Development Scheme.

    e. Half (13 out of 26) of the respondents identified that they believed that they had been bullied.

    f. More than half (15 out of 26) of the respondents identified that they believed that they had witnessed bullying.

Survey Feedback

31. As part of the survey, respondents were asked for any suggestions for improvements in workplace culture, WHS or any other areas. The following information was supplied:

    <u>Concerns raised during the survey</u>

32. From the survey, there were concerns identified by workers and Inspectors:

    a. Workers requested confidentiality and anonymity in completing the survey due to fears of being identified.

    b. A number of workers participating in the survey were visibly upset and distressed (crying) when talking with Inspectors. In these instances, Inspectors encouraged workers to seek help through the Employee Assistance Program and other providers.

    c. Concerns were raised by workers regarding colleagues considering self-harm, workers on mental health plans and medication as a result of work stresses.

    <u>General Comments</u>

    a. Workers were passionate about 'their organisation' and demonstrated concern for their colleague's welfare.

    b. Risk management – GBRMPA are not effectively engaging with risk.

c. Reporting culture – GBRMPA should focus on rewards rather than a blame culture. Consider a no blame reporting culture, invest time in investigating and fixing matters, and identify root causes.

d. Data – GBRMPA should use APS survey data to identify issues and guide actions.

e. Multiple workers provided feedback in relation to the opportunities for the organisation with the commencement of Mr Thomas in the CEO role. Opportunities were identified in the areas of looking at workplace culture and identifying what the desired culture is and how to get there, workers advised that they had seen positive change happening and believed that he is a 'people person and appears to be addressing issues'.

f. Workers commented on the change in the organisation to a more 'Canberra style department' and the loss of the 'family style' of the organisation.

g. Workers repeated concerns about people considering self-harming, suffering from severe anxiety and being on anti-depressant medications are distressing. In these instances, workers advised that the person involved had sought appropriate assistance.

h. Workers seeing the impact of psychosocial risks on others in the form of people breaking down in tears, hysterical crying and needing to be escorted home, requiring mental health plans and medication due to stress and anxiety related complaints.

<u>WHS</u>

a. Resourcing in the WHS area and Corporate Services Branch was identified as an issue. The WHS area was seen as proactive, however more of a team effort is needed rather than only one person doing the work.

b. The need to update and implement the WHS Manual, including group training not just on-line training for WHS.

c. More encouragement required from GBRMPA for workers to report incidents.

d. The management of mental health generally, particularly in the corporate services branch, around addressing change management and psychosocial risks.

e. There needs to be more transparency in addressing psychosocial issues including bullying and harassment. An alternative procedure for reporting is required, there is not alternate option at the moment. Process for dealing with complaints and reports when dealing with senior personnel.

f. A lack of faith that psychosocial issues raised would be dealt with and addressed by the organisation.

<u>Performance Management</u>

a. Performance management in the organisation relies on implementation by individuals. The supporting policies, documentation and training need to be improved. Workers raised that policies were not being used and that the threat of performance management was being used to bully workers instead of manage performance.

b. Following the performance management process through. Human Resources need to get more involved with disciplinary issues rather than put it all on the manger.

POWER EXERCISED (if any)

Section of Act	Nature of Inspector action/decision
None	Not exercised

COMPLIANCE STATUS OF PREVIOUSLY ISSUED NOTICES (if any)

Notice	Description	Status

REPORT ISSUED BY	**Inspector:**	s47F	**Phone:**	s47F
	Email:	s47F	**Region:**	QLD
INSPECTOR'S SIGNATURE	**Signature:**	s47F	**Date:**	1/08/2019

DISCLAIMER

This report contains information that may assist you take steps regarding your obligations under the WHS Act. You must refer to the *Work Health and Safety Act 2011* (Cth) (**WHS Act**) and *Work Health and Safety Regulations 2011* (Cth) (**WHS Regulations**) to understand your duties and obligations. Comcare's external website contains hyperlinks to WHS Act legislation.

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NEED HELP?

Contact the Inspector to discuss any aspect of this Inspector Report. The Inspector should be contacted if you wish to view photographs, documents or other evidence taken by the Inspector if they attended your workplace.

Comcare has a range of publications and fact sheets to help explain your responsibilities and provide guidance to make your workplace safer. The *Compliance and Enforcement Policy* provides guidance as to how Comcare approaches regulation. To access these, visit our website.

REVIEW OF DECISIONS

Where a Decision Maker Review is unsatisfactory, the recipient of the report should seek independent legal advice on review rights.

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Your privacy is important to us. We will only collect, use or disclose personal information in accordance with the *Privacy Act 1988* (Cth) and if it is reasonably necessary for, or directly related to, one or more of our functions, powers and/or activities. These include functions and activities under the *Safety, Rehabilitation and Compensation Act 1988* (Cth), the WHS Act, the *Seafarer's Rehabilitation and Compensation Act 1992* (Cth), and the *Asbestos-related Claims (Management of Commonwealth Liabilities) Act 2005* (Cth). If Comcare does not collect personal information from you, for the purposes of its legislated functions or related functions, we may not be able to respond appropriately.

Comcare is the Commonwealth agency authorised by the WHS Act to collect personal information relevant to the exercise of functions and powers under the WHS Act, *Work Health and Safety Regulations 2011* and the administration and evaluation of Comcare's WHS programs. Any personal information collected in these forms will be used for those purposes.

In exercising our functions and powers, we may disclose personal information, subject to confidentiality of information provisions under the WHS Act, to the following bodies and agencies, including but not limited to:

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- the Safety, Rehabilitation and Compensation Commission
- a court or tribunal
- state or territory work health and safety regulatory agencies
- personnel engaged by Comcare to conduct research related activities
- enforcement agencies or bodies
- state and territory Coroners
- Commonwealth, state or territory industry regulators
- any other person assisting Comcare in the performance of its functions or exercise of its powers, including contractors and consultants
- any other person where there is an obligation under law to do so (for example but not limited to, responding to the direction of a court to produce documentation).

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From: s47F
To: "Josh Thomas"; s47F
Cc: s47F
Subject: RE: Comcare Inspector Report CRM:0019100377 [SEC=UNCLASSIFIED]
Date: Tuesday, 6 August 2019 9:49:39 AM
Attachments: image001.png

UNCLASSIFIED

Hi Josh,

Thank you for your response and update, we look forward to working through the process with you.

Regards,
s47
F

Assistant Director
Regional Operations Queensland | Regulatory Operations Group
Inspector appointed under Section 156 of the *Work Health and Safety Act 2011*

P s47F
M

Comcare
GPO Box 1993, Canberra, ACT 2601
1300 366 979 | www.comcare.gov.au

From: Josh Thomas s47F
Sent: Friday, 2 August 2019 5:04 PM
To: s47F
Cc: s47F

Subject: RE: Comcare Inspector Report CRM:0019100377 [SEC=UNCLASSIFIED]

Dear s47 and s47F

Thank you for providing the Great Barrier Reef Marine Park Authority a copy of your Inspector's Report. I and my colleagues appreciated the pre-briefing yesterday and have already commenced a process to review more closely your findings.

I intend to respond quickly and with care to all your recommendations, with a view to improving not only our systems and processes, but also the real welfare of our staff. GBRMPA may seek to clarify certain elements of the report with you in the weeks ahead, with a view to ensuring our planned actions are as effective as possible.

One early action I have taken is to email all staff about this process to ensure transparency, and to demonstrate a senior commitment to work health and safety improvement – especially psychosocial health. I will be following up regularly with information and tools through managers to make improvements to a workplace culture supporting better psychosocial health.

GBRMPA is committed to ongoing co-operation with Comcare and I am confident that, with your

guidance, we will be able to improve the psychosocial health of our workers.

I look forward to meeting with you in September to discuss the agency's progress.

Warm regards

Josh Thomas
Chief Executive Officer
Great Barrier Reef Marine Park Authority
280 Flinders Street Townsville | PO Box 1379 Townsville QLD 4810
Phone: s47F
Email: s47F

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From: s47F
Sent: Thursday, 1 August 2019 2:15 PM
To: Josh Thomas s47F
Cc: s47F
Subject: Comcare Inspector Report [SEC=UNCLASSIFIED] CRM:0019100377

UNCLASSIFIED

Good afternoon Josh,

Thank you for your time this afternoon and your assistance in this process.

As discussed, please find attached the Inspector Report finalising this inspection.

Please do not hesitate to contact s47F or myself if you would like to discuss any aspect of the report.

Thanks and kind regards,
s47F

Assistant Director
Regional Operations Queensland | Regulatory Operations Group
Inspector appointed under Section 156 of the *Work Health and Safety Act 2011*

P s47F
M

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GPO Box 1993, Canberra, ACT 2601
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From: s47F
To: s47F
Cc: s47F Josh Thomas
Subject: GBRMPA Update - Email 1 of 2 [SEC=UNCLASSIFIED]
Date: Sunday, 29 September 2019 8:36:32 PM
Attachments: WHS Working Group Action Plan 260919.pdf
Bio s47F and Co.pdf

Good evening s47F

I refer to my conversation with s47F on 12 September 2019, where he advised that your planned trip to Townsville in the following week was no longer proceeding (noting that Josh Thomas, GBRMPA CEO had tentatively set aside time in his diary to meet with you on the afternoon of 17 September 2019 or the morning of 19 September 2019). In light of that, it was decided to postpone the proposed meeting to a later suitable date. We are looking forward to having the opportunity to meet at that later date and to discuss our progress on matters since the Comcare visit back in May this year.

In the meantime, I undertook to provide you with an update on the work that we have been progressing since receipt of the Comcare Investigator Report (the Comcare Report), dated 1 August 2019 and hope that you will find the following useful as a reference point for the work that is being progressed.

Formation of WHS Working Group, Action Plan and Chronology

I'm pleased to report that we've completed many important steps to address the corrective actions contained in the Comcare Report, with further actions in train. This has included the formation of a dedicated WHS Working Group to give the Authority extra drive in developing the tools, systems and training needed to improve how we approach work health and safety – especially psychosocial health. The CEO has pulled me offline from my usual role and tasked me with leading that group in a newly formed position as Director, WHS Working Group. Other members include the CEO, the Chairman of the Workplace Health and Safety Committee, the Director of Human Resources and a Community and Public Sector Union representative. To date, this WHS Working Group has met on four (4) occasions. The Working Group's primary focus has been to comprehensively address the corrective actions identified in the Comcare Report. At the same time, the Working Group has reflected on the comments contained in the survey feedback section of the Comcare Report and has proposed actions to address those comments/observations/concerns. Furthermore, the Working Group has identified and is continuing to identify additional actions which we believe (or which staff have suggested to us) would positively contribute to the psychosocial health of our workforce.

Information relating to all of these initiatives/actions is contained within the attached WHS Working Group Action Plan. Please take some time to look through this Action Plan to gain an understanding of the work that is being progressed. For your wider visibility, I will also attach in a separate email (immediately following this one) the WHS Working Group Chronology. This document provides an overview of key actions that have been progressed to date and provides the corresponding documents to reflect the work achieved. You will note in the Chronology that there are numerous communications from the CEO to all staff clearly outlining his expectations for approaching psychosocial health matters in the workplace. In addition to this, the Chronology also contains the letters that the CEO provided to each of the General Managers

clearly outlining his increased focus on and expectations of them to appropriately manage and deliver in this important area.

Engagement of External Consultant

One of the most significant actions that the WHS Working Group has achieved to date is the successful procurement and engagement of an external consultant, s47F from Zing and Co (see attached biography) to assist the Authority to address the corrective actions identified primarily in para 8 (a)-(d) of the Comcare Report. A brief summary of her engagement follows:

Phase 1: identify key areas of psychosocial risk

s47F is presently undertaking a desktop review based on information including, but not limited to the Comcare Report, and APS Census data from the past 24 months. She will then work with all staff (as an impartial party) to gain their views and experiences relating to psychosocial health issues, risks and concerns across the Authority. During October and November, s47F will engage with staff as follows:

1. 1:1 interviews with all senior leaders in the Authority (CEO, General Managers and EL2 staff);
2. Workshop (3 – 3.5 hour duration) with all EL1 staff;
3. Four (4) branch level workshops (3 – 3.5 hour duration) with APS staff (these will be capped at 30 participants each); and
4. 1:1 interviews with up to an additional 20 staff who may prefer to speak with Amaya on an individual basis.

s47F will also circulate to all staff an online psychosocial risk assessment survey (based on the People at Work tool designed by Comcare in collaboration with other work safe authorities and tertiary institutions) in order to capture a wide sample from staff (including contractors) across all levels of the Authority.

Following this first round of engagements, s47F will develop a preliminary Psychosocial Risk Assessment Report that will outline the specific psychosocial risks across the Authority and preliminary high level approaches for managing or eliminating these risks. The Authority will have an opportunity to consider this preliminary report and take further actions that may be necessary prior to completion of Phase 2.

Phase 2: Reality test psychosocial risks and generate initiatives to manage or eliminate risks

Based on the outcomes from Phase 1, s47F will work with myself and the other members of the WHS Working Group to design a series of highly engaging and interactive staff workshops aimed at generating initiatives to manage or eliminate risks identified in Phase 1. s47F will facilitate these workshops (at least three (3) half day workshops involving 25-30 participants from all levels of the Authority). Based on the input received from these workshops, s47F will develop a draft Psychosocial Risks and Initiatives to Manage or Eliminate Risks report. Input will be sought from the Authority prior to finalization.

It is understood that a further phase of work is required to implement agreed initiatives and to establish controls to maintain and review the ongoing psychosocial health of the workforce (this will be determined based on the outcomes from Phase 1 and 2). This work will be progressed

promptly once Phase 1 and 2 are completed.

Other actions in train

As noted in the Action Plan, other actions which are nearing completion include:

- providing relevant training (webinar and face-to-face) to staff in conjunction with National Safe Work Month (October);
- finalising and implementing the WHS Manual and identifying and providing appropriate training to all staff in relation to this;
- reviewing the adequacy of the Authority's resourcing for work health and safety; and
- updating the bullying and harassment policies and procedures with consideration to the Safe work Australia "Guide for Preventing and Responding to Workplace Bullying".

Further long term initiatives

Also noted in the Action Plan, longer term initiatives currently are in train are:

- arranging a ½ day workshop with activities/speakers (prior to Christmas) where the successes of the Authority and achievements of staff over the year can be celebrated (the work completed by s47F at this point in time may help to inform the Authority as to what speaker/activity/trainer would be beneficial);
- improving our policies and our understanding of performance management (with relevant training for staff); and
- implementing a rewards and recognition policy which is tailored specifically for the Authority, our people, and the valuable work that we undertake.

Feedback and information

Communicating the work that the WHS Working Group is undertaking, as well as being open to receiving feedback/suggestions/ideas from staff, is another important aspect of the work that is progressing. We aim to ensure that staff know that they can approach any member of the Working Group with ideas or suggestions as to how to improve the psychosocial health of our workplace. Many staff have already reached out to us and their ideas are being shared during the Working Group meetings. We are also working towards putting in place a "suggestion box" where staff can provide information relevant to their workplace (anonymously, if needed). WHS Working Group Staff Updates will be rolled out over the coming weeks (issue one features in the Chronology) and I will be presenting at many forums within the Authority (such as the Executive Management Group meetings, Senior Management Team meetings, EL1 network meetings and the Workplace Health and Safety Committee meetings).

If, after reviewing the attached materials, you require any further information from us, or would like to discuss any aspect of the work that is planned or proceeding, please don't hesitate to contact us. We would welcome the opportunity to speak with you. As noted above, the purpose of this email is to provide you with a snapshot as to where we are at and we are heading at this point in time. We acknowledge that there is further work to be done and will, of course, keep progressing this important work in a timely manner.

I'm on leave now and will return to the office on Tuesday 8 October 2019, but Josh would be happy to speak with you during that time, if needed.

Regards
s47F

s47F BComm/LLB (Hons)
Director, WHS Working Group
Working Hours: Tues, Wed and Thurs (until 2.30pm); all day Friday
Great Barrier Reef Marine Park Authority
280 Flinders Street Townsville | PO Box 1379 Townsville QLD 4810
Phone: s47F
Email:

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FOI documents - SOID14067

Australian Government
Great Barrier Reef Marine Park Authority

WHS WORKING GROUP - ACTION PLAN

(as at 26 September 2019)

	ACTION	PROGRESS	REFERENCE IN INSPECTOR REPORT *CA = corrective action SF= Survey feedback	COMMENTS	RESPONSIBLE OFFICER
1	Identify psychosocial hazards in the workplace in accordance with WHS Regulation 34 – engage a competent person, such as an organizational psychologist, to review psychosocial risks within the organization including the following psychosocial risk factors: a. Poor workplace relationships b. Low role clarity c. High job demands d. Poor organisational change management; and e. Poor organisational justice.	GM Corp Services contacted two potential providers initially. WHS WG agreed to seek further potential providers. Director WHS WG contacted numerous other providers, and subsequently obtained expressions of interest from a further two providers. WHS WG considered all expressions of interest and agreed to engage s47F Principal – Zing and Co. Procurement finalised and contract formed 26 September 2019. .	CA Para 8(a) and 7	WHS WG Director confirmed with Comcare that it was not necessary that the provider for this work be an organizational psychologist.	Director WHS WG in consultation with WHS Working Group.
2	Manage risks to health and safety arising from psychosocial risks in the workplace in accordance with WHS Reg 35	As above	CA Para 8(b)	As above	As above
3	Implement any risk controls identified in 1 and 2 above to eliminate, and if not reasonably practicable, minimize the risks to health and safety in accordance with WHS Regs 35 and 36	As above	CA Para 8(c)	As above	As above

	ACTION	PROGRESS	REFERENCE IN INSPECTOR REPORT *CA = corrective action SF= Survey feedback	COMMENTS	RESPONSIBLE OFFICER
4	Ensure the controls implemented in 3 are maintained and reviewed in accordance with WHS Regs 37 and 38 through the use of the "People at Work" package to monitor and review ongoing psychological health of the workplace.	See above	CA Para 8(d)	See: People at work project and associated People at Work tools	As above
5	Engage an independent expert to undertake a wider health assessment of the Authority including to provide training, coaching and mediation if appropriate.	Potential suppliers referred to in 1, 2 and 3 above were asked to consider this wider body of work as relevant to the needs of the organization. s47F Principal – Zing and Co. will consider this wider body of work and provide recommendations as appropriate.	N/A	This work should be in addition to the work required by points 1, 2, 3 and 4 above. For efficiency and effectiveness, the provider of services should be the same.	Director WHS WG in consultation with WHS Working Group.
6	Review and update the bullying and harassment policy and procedure with consideration to the Safe Work Australia document "Guide for Prevention and Responding to Workplace Bullying". Include an alternative procedure for reporting bullying and harassment.	Director WHS Working Group has documents in draft to be provided to Director HR	CA Para 8(e) and SF para 32 (WHS) e	See CA Para 8(e) for specifics of detail to be included in this material.	Director WHS Working Group to draft documents. Draft documents to be provided to Director HR for comment and implementation of final.
7	Complete and implement WHS Manual – including group training	WHS Manual has been provided to staff for comment. 112 comments were received. HR analyzed and provided responses to feedback. Final checks are being undertaken.	CA Para 8(e) and SF para 32 (WHS) b and c	CEO provided agreement to engaging s47F (or similar matter expert) to provide relevant training.	GM Corporate Services / Director HR.

	ACTION	PROGRESS	REFERENCE IN INSPECTOR REPORT *CA = corrective action SF= Survey feedback	COMMENTS	RESPONSIBLE OFFICER
		GM Corporate services provided an email to the CEO and EMG on 25 September 2019 advising of: • anticipated date for finalization of WHS Manual; and • options (provider and relevant content) of suitable training. EMG Out-of-Session paper also attached to email providing further update on progress towards finalising the WHS Manual. (At this point in time, completion of manual anticipated to be end of October).			
8	Implement "Rewards and Recognition Policy" to shift focus to a rewards rather than a blame culture	GM Corporate services has been tasked with providing information to EMG. This will be done in conjunction with the paper to EMG on performance management (see points 11 and 12) and will occur closer to 3rd quarter of FY. In the meantime, Assistant Director – HR Strategy has been tasked with progressing this body of work (consultation etc) and providing recommendations to WHS Working Group. A copy of DoEE's Rewards and Recognition Menu and Policy has been provided for her review.	SF Para 32 (general comments) c	CEO has requested that information is provided to EMG.	GM Corp Services/ Director HR.
9	Review APS Survey data to identify issues and guide actions	WHSC Chair has provided a draft summary branch comparison	SF Para 32 (general comments) d	Branch breakdown as well as whole organization results have been provided to /s47F	Director HR and WHSC Chair

	ACTION	PROGRESS	REFERENCE IN INSPECTOR REPORT *CA = corrective action SF= Survey feedback	COMMENTS	RESPONSIBLE OFFICER
				s47F as part of the desktop review work in points 1 – 5 above.	
10	Review resourcing in the WHS area	GM Corporate Services has been tasked with preparing a Minute to the CEO.	SF Para 32 (WHS) a	GM Corporate services to prepare Minute to the CEO to confirm (or provide recommendations) about suitability of resourcing for WHS. This should include: • HR section plan/ Org chart; • details and skills of WHS staff and how they match their positions; • note around additional resources in agency re WHS such as WHS Committee, HSRs, HCOs, online training etc.	GM Corporate Services/ HR Director
11	Improve supporting policies and documentation of performance management as well as provide training.	GM Corporate Services has been tasked with preparing an EMG paper. Substantive work likely to occur in 3rd quarter of FY.	SF Para 32 (Performance Management) a	GM Corporate Services to prepare EMG paper about the need to update performance management documentation and policies and the timeline to report back to EMG with draft materials.	GM Corporate Services/ HR Director
12	Managers are assisted in the performance management process through the HR section	See above	SF Para 32 (Performance Management) b	See above	GM Corporate Services/ HR Director
13	Contact the Museum of Australian Democracy at Qld Parliament House for information	Task with CPSU delegate for action.	N/A	CPSU working group representative to approach the	CPSU working group representative

	ACTION	PROGRESS	REFERENCE IN INSPECTOR REPORT *CA = corrective action SF= Survey feedback	COMMENTS	RESPONSIBLE OFFICER
	(based on their previous experience) on improving workplace culture			museum and write a report back to the Director WHS Working Group about the Museum's "lessons learned" as well as any useful suggestions for additional actions.	
14	Statement of Expectations from CEO to all GM's	TASK COMPLETED Individual letter to GM's (3 pages each) forwarded on 16 September 2019	N/A		CEO
15	CEO to meet with Sue Weston (CEO Comcare)	Task with CEO for action	N/A	To engage with Comcare (in role as new Agency Head) and seek feedback about process Comcare undertaking.	CEO
16	Meet with APSC, SWA.	Task with Director WHS Working Group for action	N/A	Meeting to obtain contemporary advice on practice and procedures.	Director WHS Working Group
17	Update intranet to include the following "Psychosocial Hazards – Managing your People"	Task with Director WHS Working Group for action	N/A		Director WHS Working Group. Draft documents to be provided to Director HR for comment and implementation of final.
18	Register for RUOK day and host an all-staff morning tea with a brief speech from the CEO	TASK COMPLETED Morning tea held on 12 September 2019 in main office as well as regional offices.	N/A	R U OK? Day morning tea communicated externally via Linkedin with short message and photos. Internal communications also included the CEO update as well as the first edition of the WHS WG Staff Update.	Director WHS Working Group in conjunction with Chair WHSC

	ACTION	PROGRESS	REFERENCE IN INSPECTOR REPORT *CA = corrective action SF= Survey feedback	COMMENTS	RESPONSIBLE OFFICER
19	Provide training in conjunction with Safe work month	Training calendar provided to WHS Working Group	N/A		Director HR in conjunction with Chair WHSC
20	Provide ½ day session in November before staff head on leave for Xmas break. Focus: • ice breaker • celebrate success/staff achievements • inspirational speaker	Members of WHS Working Group to consider possibilities. Assistant Director – HR Strategy to provide recommendations to WHS Working Group.	N/A	s47F will have completed her first round of engagement with staff. At that point in time, she may be able to provide us with view as to what type of speaker/trainer would be beneficial for this occasion.	WHS Working Group
21	Implement suggestions box	Task with Assistant Director HR Operations.	N/A	Assistant Director HR Operations was Acting in the role of the Director of HR when this issue was raised/discussed in ACG meeting on 17/09/19.	Assistant Director HR Operations to provide proposal to WHS WG for consideration.
22	Include a 'Goal / Deliverable' in the PDA for all GMs around meeting WHS obligations and with a particular focus on psychosocial health.	To be progressed	N/A	Refer to email 30/08/19	Director WHS Working Group

s47F

s47F

From: s47F
Sent: Sunday, 29 September 2019 8:41 PM
To: s47F
Cc: s47F Josh Thomas
Subject: GBRMPA Update - Email 2 of 2 [SEC=UNCLASSIFIED]
Attachments: WHS Working Group Chronology 260919.pdf

WHS Working Group Chronology attached.

s47F *BComm/LLB (Hons)*
Director, WHS Working Group
Working Hours: Tues, Wed and Thurs (until 2.30pm); all day Friday
Great Barrier Reef Marine Park Authority
280 Flinders Street Townsville | PO Box 1379 Townsville QLD 4810
Phone: s47F
Email:

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Australian Government
Great Barrier Reef Marine Park Authority

WHS WORKING GROUP – CHRONOLOGY

(as at 26 September 2019)

DATE	EVENT		NOTES	DOCUMENT INCLUDED BELOW
15/08/19	Email	To: All Staff From: CEO	Learning about psychosocial health	✓
16/08/19	Email	To: All Staff From: CEO	Formation of dedicated WHS Working Group including appointment of Jameelie Fletchett as Director, WHS Working Group for a period of 10 weeks commencing 23/08/19.	✓
20/08/19	Email	To: All Staff From: CEO	Census Information	✓
21/08/19	Meeting	CEO Chair WHSC Director, WHS WG Director, HR CPSU delegate	WHS Working Group Meeting #1	
05/09/19	Meeting	Chair WHSC Director, WHS WG Director, HR CPSU rep	WHS Working Group Meeting #2	
12/09/19	Morning Tea	All staff	R U OK? Day morning tea	✓
12/09/19	Email	To: WHS WG From: Director, HR	Calendar of events for safe work month	✓
13/09/19	Meeting	CEO Chair WHSC Director, WHS WG Director, HR	WHS Working Group Meeting #3	

16/09/19	Letter	To: All General Managers From: CEO	CEO expectations for approaching psychosocial health matters in the workplace	✓
20/09/19	Email	To: All Staff From: CEO	WHS Working Group – Staff update Issue 1	✓
25/09/16	Presentation	To: EMG From: Director WHS WG	EMG presentation #1. Tabled Action Plan as at 25 September 2019.	
25/09/19	Email	To: EMG From: GM Corp Services	Update on Item 7 of WHS Working Group Action Plan re Complete and implement WHS Manual – including group training. Email attaches Out-of-Session EMG paper re Update on Progress Towards Finalising GBRMPA WHS Manual (expected by end of October 2019)	✓
26/09/19	Contract	GBRMPA s47F	Contract Executed – Desktop review commenced	

s47F

From: Josh Thomas
Sent: Thursday, 15 August 2019 8:17 AM
To: All Staff
Subject: Learning about psychosocial health [DLM=For-Official-Use-Only]

Dear colleagues

I advised recently I would follow up with some additional information about workplace health and safety, particularly psychosocial health. As you already know, it is our responsibility under the law to eliminate or minimise risks to the health and safety of our staff, including their psychological health. While it's usually obvious where something is a risk to a worker's physical health (for example a slip hazard such as a spill), psychosocial hazards are not always as obvious.

Work and life in general can be stressful at times and, while stress alone does not necessarily constitute a physical or psychological injury, prolonged work-related stress can cause both psychological and physical injuries. It is our collective responsibility to manage psychosocial hazards (such as extreme job demands or bullying), in the same way as any other health and safety risks (such as a slippery floor). This includes identifying any hazards, assessing risks associated with those hazards, implementing measures to control them, and reviewing those controls to ensure their effectiveness.

In the interest of gaining a better collective understanding of psychosocial health, I'd like to draw your attention to some resources that are available to you if you would like to learn more about psychosocial health. I've found these reference points a useful start in learning more about psychosocial health, its risks and treatments.

In house, we can look to trusted colleagues in our HR/Work Health and Safety Team, Health and Safety Representatives (HSR's) and/or Harassment Contact Officers (HCO's) if, at any time, we are concerned about a physical or psychosocial hazard affecting us or any other worker. There are also resources available on the Work Health and Safety team's intranet page under the banner 'Mental Health Resources'.

Across Government, our two most prominent sources of expert advice are Comcare and Safe Work Australia. These agencies provide materials and information regarding psychosocial hazards in the workplace and I have included immediately below some relevant links for your reference.

Safe Work Australia - Work Related Psychological Health and Safety Guide

Comcare - Preventing harm - Psychosocial Hazards

GBRMPA also provides staff with a counselling service via our Employee Assistance Provider Max Solution. This service is confidential and can be accessed 24 hours a day, 7 days a week by phoning

As in all workplaces, our organisation must continually strive to maintain an environment supporting a healthy and productive workforce so we can all deliver the best outcomes in alignment with our stated objectives. Together with you, I want to learn more about how we can identify and address both physical and psychosocial hazards in the workplace in support of a healthier and more productive environment. I'd also like to assure you that, following receipt of Comcare's recent report to us, we are already taking steps in the right direction.

I look forward to sharing with you more information and approaches to managing for a healthier workplace in the weeks ahead.

Warm regards

Josh

Josh Thomas
Chief Executive Officer
Great Barrier Reef Marine Park Authority
280 Flinders Street Townsville I PO Box 1379 Townsville QLD 4810
Phone: s47F
Email:



s47F

From: Josh Thomas
Sent: Friday, 16 August 2019 6:41 PM
To: All Staff
Subject: New WHS Working Group [SEC=UNCLASSIFIED]

Dear colleagues

I would like to share with you some arrangements I believe will help us drive improvement in in addressing issues associated with workplace health and safety here at GBRMPA.

As you know, Comcare recently provided us a report with recommendations on how we can improve psychosocial health outcomes in the workplace. We are responding to these recommendations comprehensively and I feel it is important to dedicate sufficient resources and expertise to doing so. Accordingly, I have asked s47F Senior Legal Officer in Legal Services, to lead a dedicated Work Health and Safety Working Group for the next 10 weeks starting Friday 23 August, with some initial work commencing immediately.

s47F will go offline, from Legal Services as an acting Director to develop an action plan that responds to Comcare's recommendations but also, very importantly, includes *additional* measures that will support a healthier and more productive workplace culture.

s47F has relevant legal and HR experience, is a Health and Safety Representative, and has a strong commitment to improving the professional culture of our organisation. s47F will report directly to me, and be supported by WHS Working Group colleagues:

- s47F General Manager, Reef Protection and Chair of the Authority's Work Health and Safety Committee
- s47F A/g Director, Human Resources, Corporate Services
- s47F A/g Assistant Director, International, Strategic Advice, Reef Strategy Branch, and CPSU Delegate
- Health and Safety Representatives will also be consulted in our approach.

s47F and s47F will remain in their existing positions, providing support to s47F as required.

The WHS Working Group will meet next week, and weekly thereafter, reporting regularly on progress to the Executive Management Group. The WHS Working Group will be sharing updates and advice with staff over the coming weeks, as well as further information on how staff can feed in ideas and suggestions.

I would like to thank s47F and the Legal Services team for sharing s47F 's expertise for this process. I would also like to thank you all in advance for your respectful and professional engagement with this important work in the weeks ahead, and beyond.

Many thanks
Josh

Josh Thomas
Chief Executive Officer
Great Barrier Reef Marine Park Authority
280 Flinders Street Townsville | PO Box 1379 Townsville QLD 4810
Phone: s47F
Email:



We acknowledge the traditional custodians of the Great Barrier Reef and throughout Australia. We pay our respects to their elders past, present and future.
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s47F

From: Josh Thomas
Sent: Tuesday, 20 August 2019 5:12 PM
To: All Staff
Subject: Census information [SEC=UNCLASSIFIED]

Dear Colleagues

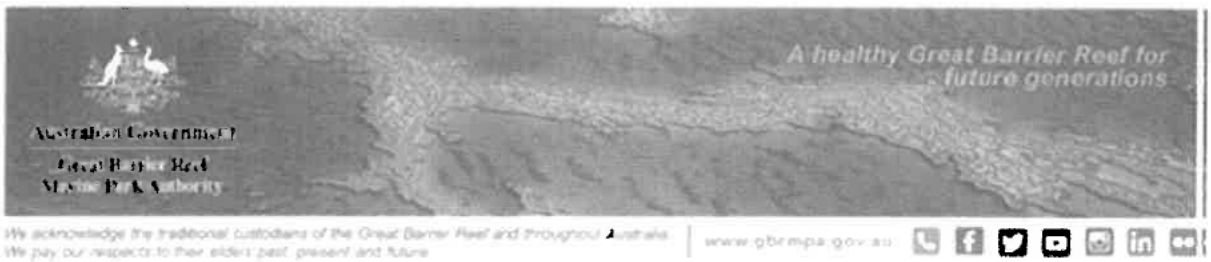
Thank you for your time at this afternoon's 'All Staff' meeting. As discussed today, I encourage you to review the APS Census GBRMPA Highlights report (available here) and to review the results within your Branches and Sections.

The GMs will provide Branch results shortly to support discussion around the highlights and concerns for each work area.

I look forward to working with you to continue to invest in GBRMPA as a positive and productive workplace.

Josh

Josh Thomas
Chief Executive Officer
Great Barrier Reef Marine Park Authority
280 Flinders Street Townsville | PO Box 1379 Townsville QLD 4810
Phone: s47F
Email:



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EXTRACT FROM CEO'S UPDATED DATED 20 SEPTEMBER 2019

R U OK? Day s47F

It was great to come together in the Townsville Office on Thursday last week for R U OK? Day. Celebrating over morning tea gave us time to mingle and reflect on how we can all better support one another in the workplace.

This national day of action reminds everyone to ask "are you OK?" and to check in with friends and colleagues every day of the year. So let's start the conversation and help each other through life's ups and downs!

Particular thanks to s47F for making morning tea arrangements and to those staff who contributed their own culinary handiwork.

Keep reading this edition to see photos of Reef HQ and Cairns' R U OK? Day celebrations.

s47F

From: s47F
Sent: Thursday, 12 September 2019 3:52 PM
To: s47F Iosh Thomas
Subject: WHS working group action: copy of work safe month calendar [SEC=UNCLASSIFIED]

Hi all,

An action of mine last week was to source and distribute the calendar of events for the upcoming work safe month in October. Please refer to the calendar of events to see what is currently proposed. Let me know if you have issues accessing and I'll get it as an attachment.

Perhaps we can share thoughts on any additional offerings based on our discussions from last week.

Regards,
s47F

Mon	Tue	Wed	Thu	Fri
	1 s47 to email all staff regarding Safe work Month 2019	2	3	4
PUB HOL	8	9 1.00pm – 2.00pm s47F presentation working isolated and remotely. Various webinars on mental health in the workplace in the Gothenburg from 2.00pm to 5.00pm	10 11.00am 12.00pm WHS bake off World mental health day	11
14	15	16	17 s47F Safety Advocate 11.00AM (SESSION 1) 1.00PM (SESSION 2)	18
21	22 10.30am – s47F Beyond Blue/Head space speaker (Reef HQ?) Gothenburg room booked from :30pm	23 Gothenburg room booked from 10.30am Beyond Blue/Head space speaker	24	25
28 1.00-4.30pm WHS Committee meeting 3.30 - 4.00pm draw of 100's board winner and all staff question time	29 11.00am s47F Reef HQ Safety Advocate	30	31	

Notes: October 2019

Oct 1: Welcome to Safe Work Month email to all staff s47F

Oct 9: 11.30am – 4.30pm Gothenburg booked
1.pm – 2pm s47F isolated and remote work (s47 CONFIRMED
2.00pm to 5.pm -This week is mental health week, so today suggest we play various webinars highlighting mental health in the workplace (Emotionally challenging work – managing the risk, How to create a mentally healthy workplace. Early intervention for managing psychological injuries) – s47F

Oct 10: Mental Health Day -
11.00am – WHS bake off (s47F

Oct 17: s47F (https://www.worksafe.qld.gov.au/safety-advocates s47F – Safety Advocate
2 sessions 11.am and 1.00pm (s47F CONFIRMED

Oct 28: WHS Committee meeting– 3.30pm – 4.00pm all staff invited for question time CONFIRMED and drawing of the 100's board winner s47F

22 OCT: 10.30am Beyond Blue speaker s47F will share his journey of hope, recovery and resilience in the face of a mental health condition s47F CONFIRMED (venue TBC – maybe Reef HQ)

23 Oct:
Head Space speaker s47F

Oct 29: s47F - (https://www.worksafe.qld.gov.au/safety-advocates s47F Safety Advocate – Venue **Reef HQ** at 11.00am (s47F CONFIRMED

FOI documents - SOID14067

Australian Government
Great Barrier Reef
Marine Park Authority

s47F
General Manager Reef Strategy
Great Barrier Reef Marine Park Authority
John Gorton Building
King Edward Terrace, Parkes, ACT 2601

Dear s47F

Workplace Health and Safety

I write regarding my expectations for approaching psychosocial health matters in the workplace. I am writing in similar terms to all SES staff with the intention of ensuring a shared understanding of the importance of workplace health and safety and the principles supporting it. As an SES Officer and member of the Authority's Executive Management Group you have a prominent leadership role in facilitating a healthy and productive workplace. The expectations outlined here do not apply exclusively to SES Officers and should be promoted through your branches and sections.

As an experienced SES officer you have a high level of responsibility for, and play a critical role in, leading your branch to achieve results in line with the Authority's goals. I am sure you will agree that, in delivering against our legislative responsibilities to ensure a healthier Reef for future generations, it is primarily our staff, their expertise and commitment that enables fulfilment of our obligations to the public.

The Authority's operating environment is a complex one. While physical pressures on the Great Barrier Reef are increasing, so too are the demands and expectations on this organisation and its staff. As senior staff, we have a collective obligation to manage these pressures in a way that minimises workplace health and safety risks to the Authority's workers. The Authority's new Work Health and Safety Working Group is coordinating a suite of training, advice and improvements to how we all approach workplace health and safety – it is my expectation this work is championed by you and promoted through Directors to all staff. The terms 'leadership', 'accountability' and 'responsibility' are not reserved for senior leaders. Everyone is responsible for setting an example and ensuring our work environment is as healthy and safe as reasonably practicable.

As a workplace, the Authority can provide people a sense of purpose, identity, structure, self-worth and fulfilment. Our organisation's particular circumstances dictate we are a small, Commonwealth Agency, located largely in regional Queensland, with many of our staff enjoying longstanding and close working relationships with one another. While a combination of these factors can limit our organisational agility at times, our organisation's care and concern for one another can also be a unifying and resilience-building factor among staff.

280 Flinders Street
PO Box 1379
Townsville Qld 4810
Australia

Phone + 61 74750 0700
Fax + 61 7 4772 6093

info@gbrmpa.gov.au
www.gbrmpa.gov.au

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Marine Park Authority

Your style of leadership matters. Your staff look to you for guidance in their work, but also to be a steadying hand where uncertainty presents in the workplace.

While I know you are deeply aware of your responsibilities to promote the Australian Public Service Values and operate in accordance with relevant legislation supporting better workplace health and safety outcomes, I ask that you re-familiarise yourself with, as a minimum, the following materials, especially as they support a healthier workplace:

- Australian Public Service Values;
- Australian Public Service Code of Conduct;
- *Work Health and Safety Act 2011*;
- *Work Health and Safety Regulations 2011*;
- *Work Health and Safety Act 2011*, Approved Codes of Practice.

Workplace relationships are integral to the Authority's ability to perform effectively and efficiently and central to individual well-being. The quality of relationships throughout the agency can make our work more rewarding, stimulating and engaging. Strong and productive relationships support a more motivated, committed and engaged workforce which is crucial to productivity. It is important to note employees are required to follow lawful and reasonable directions given by someone with authority to do so. Such direction must be reasonable in the circumstances and proportionate to the end to be achieved.

As an APS employee, you are required to treat everyone with respect and courtesy, and without harassment. Courteous workplace behaviour does not necessitate the imposition of rigid rules on workplace styles, relationships or social activities; but should recognise we have a mix of people with different backgrounds, interests and personal values who all need to get along to be productive in the workplace.

I would like to emphasise some key management tenets that support better workplace health and safety outcomes, especially for psychosocial health. In the context of a pressured or changing work environment, it is particularly important to:

- Ensure senior staff are united in their commitment to reducing workplace stress;
- Foster constructive workplace relationships;
- Be clear about staff roles and the expectations on them;
- Manage effectively peak workloads for and with staff;
- Support strong organisational change management, especially through consultation with staff;
- Commit to strong organisational justice, by addressing problems promptly and through appropriate channels;
- Be familiar with our organisation's management systems and processes supporting the treatment of workplace health and safety risks;
- Respect all staff.

280 Flinders Street
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Leadership in the Australian Public Service also includes an obligation to have the courage to address difficult issues. Where misconduct and other unacceptable behaviour is raised by staff, I expect all reasonable steps to be taken to address these matters in a timely manner.

Senior staff are not immune to stresses in the workplace and I would like to assure you my door is always open to discuss your own challenges where they arise. The EMG is a highly experienced team with differing but complementary skillsets capable of tackling difficult matters, and I encourage you to engage openly with your colleagues in addressing problems and advancing our organisation's interests. In addition to training already planned, I am also supportive of providing more tailored learning for senior staff in the pursuit of a healthier workplace.

I would like to be clear that, while working to promote a healthier workplace, I remain committed to investing in improved capabilities in our staff and modernising our systems and processes to support a more efficient and effective organisation. This accords with the Australian Public Service Commissioner's Directions to promote continuous improvement, and pursue and support training and development to improve capability.

Whether the drivers are internal or external, managing change in the Australian Public Service and the Authority will remain a constant, bringing with it workplace health and safety hazards requiring careful management. In my communications with staff, I will continue to emphasise the collective responsibility all officers have for fostering a healthy and productive workplace. I also intend to ensure the necessary resources are available to support a stronger organisational understanding of what is reasonable management action, appropriate behaviour, the APS values, and other important contextual information.

Like you, I expect to be held to the highest standards in leading, shaping and supporting the work of the Authority and its staff. I look forward to working with you to foster a safer and healthier workplace into the future.

Yours sincerely

s47F

Josh Thomas
Chief Executive Officer

16 September 2019

280 Flinders Street
PO Box 1379
Townsville Qld 4810
Australia

Phone + 61 74750 0700
Fax + 61 7 4772 6093

info@gbrmpa.gov.au
www.gbrmpa.gov.au

FOI documents - SOID14067

Australian Government
Great Barrier Reef
Marine Park Authority

s47F

General Manager Reef Engagement
Great Barrier Reef Marine Park Authority
280 Flinders Street
Townsville QLD 4810

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- Be clear about staff roles and the expectations on them;
- Manage effectively peak workloads for and with staff;
- Support strong organisational change management, especially through consultation with staff;
- Commit to strong organisational justice, by addressing problems promptly and through appropriate channels;
- Be familiar with our organisation's management systems and processes supporting the treatment of workplace health and safety risks;
- Respect all staff.

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Australia

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info@gbrmpa.gov.au
www.gbrmpa.gov.au

Australian Government
Great Barrier Reef
Marine Park Authority

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Senior staff are not immune to stresses in the workplace and I would like to assure you my door is always open to discuss your own challenges where they arise. The EMG is a highly experienced team with differing but complementary skillsets capable of tackling difficult matters, and I encourage you to engage openly with your colleagues in addressing problems and advancing our organisation's interests. In addition to training already planned, I am also supportive of providing more tailored learning for senior staff in the pursuit of a healthier workplace.

I would like to be clear that, while working to promote a healthier workplace, I remain committed to investing in improved capabilities in our staff and modernising our systems and processes to support a more efficient and effective organisation. This accords with the Australian Public Service Commissioner's Directions to promote continuous improvement, and pursue and support training and development to improve capability.

Whether the drivers are internal or external, managing change in the Australian Public Service and the Authority will remain a constant, bringing with it workplace health and safety hazards requiring careful management. In my communications with staff, I will continue to emphasise the collective responsibility all officers have for fostering a healthy and productive workplace. I also intend to ensure the necessary resources are available to support a stronger organisational understanding of what is reasonable management action, appropriate behaviour, the APS values, and other important contextual information.

Like you, I expect to be held to the highest standards in leading, shaping and supporting the work of the Authority and its staff. I look forward to working with you to foster a safer and healthier workplace into the future.

Yours sincerely

s47F

Josh Thomas
Chief Executive Officer

16 September 2019

280 Flinders Street
PO Box 1379
Townsville Qld 4810
Australia

Phone + 61 74750 0700
Fax + 61 7 4772 6093

info@gbrmpa.gov.au
www.gbrmpa.gov.au

FOI documents - SOID14067

Australian Government
Great Barrier Reef
Marine Park Authority

s47F

General Manager Reef Protection
Great Barrier Reef Marine Park Authority
280 Flinders Street
Townsville QLD 4810

s47F
Dear

Workplace Health and Safety

I write regarding my expectations for approaching psychosocial health matters in the workplace. I am writing in similar terms to all SES staff with the intention of ensuring a shared understanding of the importance of workplace health and safety and the principles supporting it. As an SES Officer and member of the Authority's Executive Management Group you have a prominent leadership role in facilitating a healthy and productive workplace. The expectations outlined here do not apply exclusively to SES Officers and should be promoted through your branches and sections.

As an experienced SES officer you have a high level of responsibility for, and play a critical role in, leading your branch to achieve results in line with the Authority's goals. I am sure you will agree that, in delivering against our legislative responsibilities to ensure a healthier Reef for future generations, it is primarily our staff, their expertise and commitment that enables fulfilment of our obligations to the public.

The Authority's operating environment is a complex one. While physical pressures on the Great Barrier Reef are increasing, so too are the demands and expectations on this organisation and its staff. As senior staff, we have a collective obligation to manage these pressures in a way that minimises workplace health and safety risks to the Authority's workers. The Authority's new Work Health and Safety Working Group is coordinating a suite of training, advice and improvements to how we all approach workplace health and safety – it is my expectation this work is championed by you and promoted through Directors to all staff. The terms 'leadership', 'accountability' and 'responsibility' are not reserved for senior leaders. Everyone is responsible for setting an example and ensuring our work environment is as healthy and safe as reasonably practicable.

As a workplace, the Authority can provide people a sense of purpose, identity, structure, self-worth and fulfilment. Our organisation's particular circumstances dictate we are a small, Commonwealth Agency, located largely in regional Queensland, with many of our staff enjoying longstanding and close working relationships with one another. While a combination of these factors can limit our organisational agility at times, our organisation's care and concern for one another can also be a unifying and resilience-building factor among staff.

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Your style of leadership matters. Your staff look to you for guidance in their work, but also to be a steadying hand where uncertainty presents in the workplace.

While I know you are deeply aware of your responsibilities to promote the Australian Public Service Values and operate in accordance with relevant legislation supporting better workplace health and safety outcomes, I ask that you re-familiarise yourself with, as a minimum, the following materials, especially as they support a healthier workplace:

- Australian Public Service Values;
- Australian Public Service Code of Conduct;
- *Work Health and Safety Act 2011*;
- *Work Health and Safety Regulations 2011*;
- *Work Health and Safety Act 2011*, Approved Codes of Practice.

Workplace relationships are integral to the Authority's ability to perform effectively and efficiently and central to individual well-being. The quality of relationships throughout the agency can make our work more rewarding, stimulating and engaging. Strong and productive relationships support a more motivated, committed and engaged workforce which is crucial to productivity. It is important to note employees are required to follow lawful and reasonable directions given by someone with authority to do so. Such direction must be reasonable in the circumstances and proportionate to the end to be achieved.

As an APS employee, you are required to treat everyone with respect and courtesy, and without harassment. Courteous workplace behaviour does not necessitate the imposition of rigid rules on workplace styles, relationships or social activities; but should recognise we have a mix of people with different backgrounds, interests and personal values who all need to get along to be productive in the workplace.

I would like to emphasise some key management tenets that support better workplace health and safety outcomes, especially for psychosocial health. In the context of a pressured or changing work environment, it is particularly important to:

- Ensure senior staff are united in their commitment to reducing workplace stress;
- Foster constructive workplace relationships;
- Be clear about staff roles and the expectations on them;
- Manage effectively peak workloads for and with staff;
- Support strong organisational change management, especially through consultation with staff;
- Commit to strong organisational justice, by addressing problems promptly and through appropriate channels;
- Be familiar with our organisation's management systems and processes supporting the treatment of workplace health and safety risks;
- Respect all staff.

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Ms
General Manager Corporate Services
Great Barrier Reef Marine Park Authority
John Gorton Building
King Edward Terrace, Parkes, ACT 2601

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s47F

From: Josh Thomas
Sent: Friday, 20 September 2019 2:52 PM
To: All Staff
Subject: Work Health and Safety Working Group Update [SEC=UNCLASSIFIED]

Work Health & Safety Working Group Update

Issue No. 1
Published on 20 September 2019

Welcome:

Welcome to the first issue of the WHS Working Group staff update. We will be providing staff with periodic updates to keep you informed about the important work being undertaken to improve our organisation's approach to work health and safety.

What we've been doing:

As you know, s47F has been leading a small Working Group to give the Authority some extra drive in developing the tools, systems and training needed to improve how we approach work health and safety – especially psychosocial health. Comcare's visit to the Authority in May this year resulted in some recommendations on how we can improve the way all officers understand their responsibilities to the organisation and each other. This has been our primary focus – responding comprehensively to Comcare's recommendations.

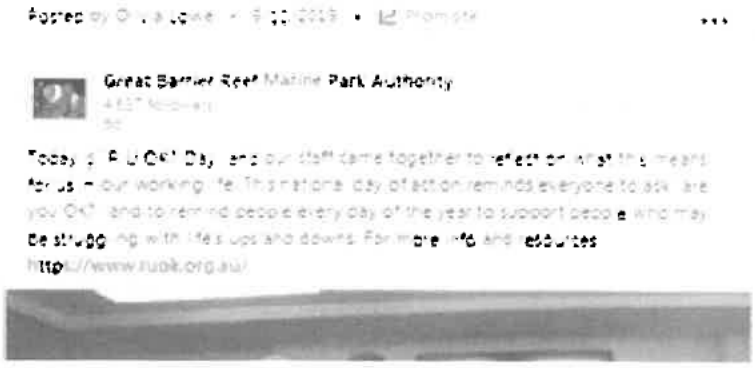
In addition, the Group has identified some other actions we feel will go even further in supporting a healthier and more productive workplace. Keep reading for more info...

Meetings and progress:

To date, the Working Group has held three meetings to progress a number of important actions; including those identified by Comcare, as well as a broad spectrum of activities identified by the Working Group. With many of you involved, we aim for the outcomes of these actions to positively contribute to the psychosocial health of our workforce, with work beginning to roll out over the coming months.

R U OK? Day morning tea

A big thank you to all those staff who participated in morning tea (main office as well as the regional offices) for R U OK? Day. The event was well attended, but more importantly serves as a reminder that the Authority is



committed to fostering a workplace culture where staff feel confident when asking this simple yet important question.

Please go to R U Ok? for more information

Key actions:

One of the most significant things that the Working Group are doing is engaging an external consultant to help us identify psychosocial hazards in the workplace. This person will adopt an inclusive approach and seek to engage many of you through workshops, face-to-face interviews and/or surveys.

Once hazards have been identified, the consultant will assist the Authority to implement risk controls to manage them p eliminating or minimizing exposure to psychosocial hazards. As you can appreciate, this process will take time to implement and the Working Group will be working closely with the consultant to ensure the process runs as smoothly as possible.

Other actions in train include:

- providing **relevant training** (webinar and face-to-face) in conjunction with National Safe Work Month (October)
- finalising and implementing the **WHS Manual** and identifying and providing appropriate training in relation to this;
- reviewing the **adequacy of the Authority's resourcing** for work health and safety; and
- updating the **bullying and harassment policies and procedures** with consideration to the Safe work Australia "Guide for Preventing and Responding to Workplace Bullying".

Further long term initiatives include:

- arranging a **½ day workshop** with activities/speakers (prior to Christmas) where the successes of the Authority over the year can be celebrated;
- improving our policies and our **understanding of performance management** (with relevant training for staff); and
- implementing a **rewards and recognition** policy which is tailored specifically for the Authority, our people, and the valuable work that we undertake.

Let's hear it:

Many of you have already made suggestions to us directly or in the corridors and we are taking them all on board. We'd like to reiterate that we are keen to hear from staff.

Over the next few weeks s47F will be making her way around to various staff meetings (e.g. SMT, EMG, ACG) to keep you all in the loop. Jameelie or any of the rest of the Group are also available individually to hear your ideas.

Whilst the Working Group is not an ongoing arrangement, it is important that staff have an avenue where they can provide input around building a safe and healthy workplace. To aid with this, we will be organising a "suggestion box" where staff can provide information (including anonymously if desired). More details on this initiative will follow soon.

Keep talking:

Sometimes opening up a discussion about how we feel about things at work can make one feel vulnerable or uncertain. Speak with a friend, your supervisor or the EAP (ph:) if these conversations about workplace health generate concerns for you.

The Australian Public Service has all the necessary provisions for staff to feel safe in airing their ideas, concerns and aspirations in the workplace. The Working Group is working to ensure the Marine Park Authority upholds and strengthei the way we do business with one another such that we can all be healthier, safer and more productive at work.

Our commitment is that your views and opinions will be taken seriously, considered and responded to as best we can.

Let's keep talking!

The WHS Working Group

s47F

s47F

From: s47F
Sent: Wednesday, 25 September 2019 3:41 PM
To: s47F Josh Thomas; s47F
Cc: s47F
Subject: FW: EMG - WHS Working Group update [DLM=Sensitive:Legal]
Attachments: WHS Working Group Action plan as at 25 Sept for EMG.docx; Bio s47F Zing and Co.pdf; EMG paper-WHS-Manual-progress_update-25 Sept 2019.pdf

Categories: Sensitive:Legal

Sensitive:Legal

Dear EMG colleagues

Item 7 of the WHS Working Group Action Plan, which s47F tabled and spoke to at this morning's informal EMG meeting, is:

> Complete and implement WHS Manual – including group training

I was asked to provide an update on progress towards completing the WHS Manual.

Please find as the third attached document to this email the relevant update. In short:

- Consultation on the draft WHS Manual occurred through August 2019. 112 pieces of feedback were received.
- The HR Section has spent September 2019 analysing and preparing responses to the feedback. We anticipated a revised/updated draft WHS Manual being completed in w/c 30 September 2019. Responses to feedback will be provided to workers at this time via a link on the GBRMPA intranet.
- There are some 'final checks' to be done in October (Comms team and GSU), before we then go through the final endorsement and approvals process.
- If the final steps proceed according to plan, the WHS Committee will be asked to endorse the final document during October 2019, before it then comes to EMG for final review / endorsement. We've proposed the CEO as the 'approver' of the final document.

I met with s47F earlier today, the author of this version of the draft WHS Manual. While he ceased his non-ongoing contract with GBRMPA in July, and is now working with another entity, s47F is currently considering an offer to return to work with GBRMPA for a short time to provide Information Sessions in conjunction with the 'launch' of the WHS Manual (i.e. for a week during November 2019). I won't know for a couple of weeks yet whether he's available to do that.

I expect that we'll also need to 'buy in' some WHS training specifically on Contractor Management to address a number of the comments made / concerns raised through the consultation process (for the Reef Interventions team in particular, but staff from the HR Section and potentially other areas might also find it beneficial).

Please let me know if you have any further questions at this point.

Kind regards
s47F

General Manager – Corporate Services
Great Barrier Reef Marine Park Authority

280 Flinders Street Townsville | PO Box 1379 Townsville QLD 4810
Phone: s47F
Mobile: s47F
Email:

Executive Assistant:
s47F
Phone: s47F



Sensitive:Legal

From: s47F
Sent: Wednesday, 25 September 2019 9:25 AM
To: s47F
Subject: EMG - WHS Working Group update [DLM=Sensitive:Legal]

Good morning s47F

Two documents attached that I may refer to during this morning's discussion.

Thanks
s47F

BComm/LLB (Hons)
Director, WHS Working Group
Working Hours: Tues, Wed and Thurs (until 2.30pm) and all day Fri.
Great Barrier Reef Marine Park Authority
280 Flinders Street Townsville | PO Box 1379 Townsville QLD 4810
Phone: s47F
Email:



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Executive Management Group **Paper** Out-of-Session

UPDATE ON PROGRESS TOWARDS FINALISING GBRMPA WHS MANUAL

Action: **FOR INFORMATION/ NOTING**

RECOMMENDATION

That the Executive Management Group (EMG):

1. **NOTES** the update on progress towards finalising the WHS Manual.

BACKGROUND

1. An internal audit of the Authority's WHS Management in 2016 resulted in a recommendation that: "the current range of policies, procedures and guidelines will be amalgamated where possible into a more streamlined and easily referenced format". This internal audit recommendation was the genesis of work, still ongoing, to bring together pertinent WHS information for GBRMPA workers into a consolidated document.
2. The original status update against this internal audit recommendation, from June 2017, notes that there were over 40 policies and procedures to be amalgamated. The original due date for completion of this action was 1 December 2017.
3. Work commenced on a draft WHS Manual through 2017-18, but was difficult to progress in light of other 'business as usual' priorities within the HR Section at the time. An additional resource (1 FTE; contractor at APS5/6 equivalent) was onboarded in Q4 2017-18, to provide additional capacity and capability to progress the WHS Manual. (NOTE: This additional resourcing ceased December 2018. Through the period the contractor was working with GBRMPA, she undertook a range of 'business as usual' WHS activities, in addition to progressing the draft WHS Manual.)
4. Comcare undertook an 'initial audit' of GBRMPA's WHS Management System on 31 July – 2 August 2018. The purpose of the audit was to assess WHS policies and practices to ensure officers of GBRMPA are able to meet and maintain their due diligence responsibilities under Section 27(5) of the *Work Health and Safety Act 2011* (Cth) (the content of which is replicated at **Attachment A**, for ease of reference).
5. The initial audit was performed against 30 criteria from the 108-criteria National Audit Tool (NAT v3), under the following five elements:
   - Element 1: Health and Safety Policies (1 criterion)
   - Element 2: Planning (5 criteria)
   - Element 3: Implementation (18 criteria)
   - Element 4: Measurement and evaluation (5 criteria), and
   - Element 5: Management review (1 criterion).
6. Against each of the 30 criteria, the possible findings are:
   - Conformance: which indicates the criterion has been met
   - Non-conformance: which indicates the criterion has not been met, or
   - Observation: where a criterion has been met but the assessor (Comcare) has identified a 'once off' situation or 'minor' deviation from the documented management system or criterion, an 'Observation' may be made. Corrective action to address the identified deficiency is required.

7. Through its initial audit of the GBRMPA WHS Management System, Comcare found:
   - Conformances totalled 23 (77 per cent)
   - Non-Conformances totalled 7 (23 per cent), and
   - Observations totalled 11.

8. A Corrective Action Plan (CAP) was developed by the HR Section in conjunction with other areas of GBRMPA to respond to the audit findings. There were 38 actions identified in the WHS Management System CAP, 10 of which will be satisfied by completing and implementing the WHS Manual.

9. The WHS Management System CAP was reviewed by GBRMPA's WHS Committee in October 2018, agreed by the Executive Management Group (EMG) in the same month, and a copy provided to Comcare.

10. Progress updates against the WHS Management System CAP are provided to EMG on a monthly basis as part of the Corporate Report. GBRMPA also provides periodic updates to Comcare on its progress against the WHS Management System CAP. As at 31 August 2019, 23 of the 38 actions in the WHS Management System CAP had been closed, with a further 10 to be closed upon adoption of the WHS Manual. Five actions are still in progress.

11. In April 2019, GBRMPA provided a copy of its draft WHS Manual to the EL2 Director responsible for the WHS function within the Department of the Environment and Energy, for peer review. Feedback from this review suggested there were significant gaps in the content of the draft document, with a number of WHS risks (such as contractor management and remote work), not adequately addressed.

12. Drafting of the current version of the WHS Manual began in May 2019 and was undertaken by an externally sourced WHS Advisor (1 FTE; non-ongoing EL1). A draft was completed in early July 2019.

KEY POINTS

13. The purposes of the WHS Manual are to:
    - support the GBRMPA Work Health and Safety Policy;
    - provide guidance to workers in GBRMPA about how WHS will be managed;
    - support effective WHS risk management;
    - provide WHS information that is relevant to GBRMPA workers;
    - provide specific procedures for the WHS Management System;
    - support WHS learning and development requirements for GBRMPA workers; and
    - support continuous improvement in WHS performance.

    The WHS Manual is described as a 'first stop shop' for pertinent WHS information; with an expectation that workers will need to access additional information and training to address WHS matters specific to their job role / duties.

14. The GBRMPA WHS Committee met on 25 July 2019 to review and discuss the draft WHS Manual, amongst other things. A small number of refinements were made to the draft WHS Manual following discussion in the WHS Committee meeting.

15. The draft WHS Manual was released for all staff consultation on 5 August 2019, for a 3-week period (concluding 23 August 2019). A WHS Manual – Information Sheet was provided to inform staff about the purpose of the consultation process.

16. There were 112 comments received during the staff consultation period.

17. Key themes in staff feedback included:

    - usability - a number of respondents commented regarding the practicality of the draft WHS Manual, noting the length of the document and whether, at around 100 pages, it was realistic to expect staff to engage with the content; or, alternatively, commenting that the content didn't offer them 'anything new';
    - correct referencing of the document - elements of the draft WHS Manual were missing appropriate referencing; and
    - role specific questions - respondents queried the application of the content of the draft WHS Manual to their individual job roles (contractor management was a particular concern for one Section).

18. During September 2019, the HR Section has analysed the feedback, drafted responses and made further refinements to the content of the draft WHS Manual as required. The HR Section has met with, or is seeking to meet with, several of the staff who provided input during the staff consultation period to clarify their comments or respond in person to the specific issues raised. Further, there are plans to meet with the author of the draft document (the non-ongoing EL1 WHS Advisor, who ceased with GBRMPA in early July 2019), to discuss several aspects of the feedback received.

19. To date (24 September), 54 of the 112 comments received through the staff consultation period have resulted in changes to the content of the draft WHS Manual.

NEXT STEPS

20. A final draft of the WHS Manual is expected to be completed in the week commencing 30 September 2019. At this time, responses to feedback received during the consultation period will be made available via a link from the GBRMPA intranet.

21. The final draft WHS Manual will undergo quality assurance by the Communications team and Governance Support Unit by indicative dates of 10 October and 17 October 2019 respectively.

22. The GBRMPA WHS Committee will be asked to endorse the final WHS Manual during October 2019, before it is submitted to EMG.

23. The aim is to implement the WHS Manual in November 2019. Ideally, staff information sessions will be held in conjunction with the 'launch' of the document.

IMPLEMENTATION

24. Once approved, the WHS Manual will be a controlled document available as a resource on the master documents list and via the GBRMPA Intranet page.

25. Changes will be made to the WHS hazard inspection checklists to ensure consistency with the approach explained in the WHS Manual.

26. The WHS Manual will replace content that is currently included in five documents (not the 40 separate policies and procedures as originally anticipated in 2016):

    - First Aid Policy and Procedure
    - Hazard Management Policy and Procedure
    - Incident Investigation Procedure
    - Lock Out Tag Out Procedure
    - HSR Issue Resolution Procedure.

ATTACHMENT A: Section 27(5) of the WHS Act

Executive Management Group **Paper** Out-of-Session

ATTACHMENT A

***Work Health and Safety Act 2011* (Cth)**

Section 27

(5) In this section, ***due diligence*** includes taking reasonable steps:

a) to acquire and keep up-to-date knowledge of work health and safety matters; and
b) to gain an understanding of the nature of the operations of the business or undertaking of the person conducting the business or undertaking and generally of the hazards and risks associated with those operations; and
c) to ensure that the person conducting the business or undertaking has available for use, and uses, appropriate resources and processes to eliminate or minimise risks to health and safety from work carried out as part of the conduct of the business or undertaking; and
d) to ensure that the person conducting the business or undertaking has appropriate processes for receiving and considering information regarding incidents, hazards and risks and responding in a timely way to that information; and
e) to ensure that the person conducting the business or undertaking has, and implements, processes for complying with any duty or obligation of the person conducting the business or undertaking under this Act; and
f) to verify the provision and use of the resources and processes referred to in paragraphs (c) to (e).

Examples: For the purposes of paragraph (e), the duties or obligations under this Act of a person conducting a business or undertaking may include:

(a) reporting notifiable incidents;

(b) consulting with workers;

(c) ensuring compliance with notices issued under this Act;

(d) ensuring the provision of training and instruction to workers about work health and safety;

(e) ensuring that health and safety representatives receive their entitlements to training.

Australian Government
Great Barrier Reef Marine Park Authority

WHS WORKING GROUP - ACTION PLAN

(as at 13 November 2019)

	ACTION	PROGRESS	REFERENCE IN INSPECTOR REPORT *CA = corrective action SF= Survey feedback	COMMENTS	RESPONSIBLE OFFICER
1	Identify psychosocial hazards in the workplace in accordance with WHS Regulation 34 – engage a competent person, such as an organizational psychologist, to review psychosocial risks within the organization including the following psychosocial risk factors: a. Poor workplace relationships b. Low role clarity c. High job demands d. Poor organisational change management; and e. Poor organisational justice.	IN-TRAIN GM Corp Services contacted two potential providers initially. WHS WG agreed to seek further potential providers. Director WHS WG contacted numerous other providers, and subsequently obtained expressions of interest from a further two providers. WHS WG considered all expressions of interest and agreed to engage s47F Principal – Zing and Co. Procurement finalised and contract formed 26 September 2019. Desktop review completed Meetings with leadership team completed Workshops for APS1 – EL1 staff taking place 12 – 16 November 2019. Survey available from 6-20 November 2019.	CA Para 8(a) and 7	WHS WG Director confirmed with Comcare that it was not necessary that the provider for this work be an organizational psychologist. WHS WG Director has met with the following groups regarding this process of work: • EMG • SMT • El1 network • HSR's (including subsequent meeting with s47F • Other staff members on a one-on-one basis.	Director WHS WG in consultation with WHS Working Group.

	ACTION	PROGRESS	REFERENCE IN INSPECTOR REPORT *CA = corrective action SF= Survey feedback	COMMENTS	RESPONSIBLE OFFICER
		As of 13 November 130 staff have completed the survey. It is expected that just over 100 staff will participate in the workshops. 38 staff (CEO, SES, EL2 and other staff) will have participated I 1:1 interviews (NB: Comcare spoke with 26 employees), .			
2	Manage risks to health and safety arising from psychosocial risks in the workplace in accordance with WHS Reg 35	As above	CA Para 8(b)	As above	As above
3	Implement any risk controls identified in 1 and 2 above to eliminate, and if not reasonably practicable, minimize the risks to health and safety in accordance with WHS Regs 35 and 36	As above	CA Para 8(c)	As above	As above
4	Ensure the controls implemented in 3 are maintained and reviewed in accordance with WHS Regs 37 and 38 through the use of the "People at Work" package to monitor and review ongoing psychological health of the workplace.	As above	CA Para 8(d)	See: People at work project and associated People at Work tools	As above
5	Engage an independent expert to undertake a wider health assessment of the Authority including to provide training, coaching and mediation if appropriate.	IN TRAIN Potential suppliers referred to in 1, 2 and 3 above were asked to consider this wider body of work as relevant to the needs of the organization. s47F Principal – Zing and Co. will consider this wider body of	N/A	This work should be in addition to the work required by points 1, 2, 3 and 4 above. For efficiency and effectiveness, the provider of services should be the same.	Director WHS WG in consultation with WHS Working Group.

	ACTION	PROGRESS	REFERENCE IN INSPECTOR REPORT *CA = corrective action SF= Survey feedback	COMMENTS	RESPONSIBLE OFFICER
		work and provide recommendations as appropriate.			
6	Review and update the bullying and harassment policy and procedure with consideration to the Safe Work Australia document "Guide for Prevention and Responding to Workplace Bullying". Include an alternative procedure for reporting bullying and harassment.	IN-TRAIN Director WHS WG provided draft Bullying and Harassment Policy and Procedure documents to HR on 15/10/19 HR provided comments on 1/11/19.	CA Para 8(e) and SF para 32 (WHS) e	See CA Para 8(e) for specifics of detail to be included in this material.	Director WHS Working Group to draft documents. Draft documents to be provided to Director HR for comment and implementation of final.
7	Complete and implement WHS Manual – including group training	IN-TRAIN WHS Manual has been provided to staff for comment. 112 comments were received. HR analyzed and provided responses to feedback. Final checks are being undertaken. GM Corporate services provided an email to the CEO and EMG on 25 September 2019 advising of: • anticipated date for finalization of WHS Manual; and • options (provider and relevant content) of suitable training. EMG Out-of-Session paper also attached to email providing further update on progress towards finalising the WHS Manual. (At this point in time, completion of manual anticipated to be end of November).	CA Para 8(e) and SF para 32 (WHS) b and c	CEO provided agreement to engagings47F (or similar matter expert) to provide relevant training.	GM Corporate Services / Director HR.

	ACTION	PROGRESS	REFERENCE IN INSPECTOR REPORT *CA = corrective action SF= Survey feedback	COMMENTS	RESPONSIBLE OFFICER
8	Implement "Rewards and Recognition Policy" to shift focus to a rewards rather than a blame culture	IN-TRAIN GM Corporate services has been tasked with providing information to EMG. This will be done in conjunction with the paper to EMG on performance management (see points 11 and 12) and will occur closer to 3rd quarter of FY. In the meantime, Assistant Director – HR Strategy has been tasked with progressing this body of work (consultation etc) and providing recommendations to WHS Working Group. A copy of DoEE's Rewards and Recognition Menu and Policy has been provided for her review.	SF Para 32 (general comments) c	CEO has requested that information is provided to EMG. Staff consultation is to occur.	GM Corp Services/ Director HR.
9	Review APS Survey data to identify issues and guide actions	COMPLETED WHSC Chair has provided a draft summary branch comparison	SF Para 32 (general comments) d	Branch breakdown as well as whole organization results have been provided to s47F s47 as part of the desktop review work in points 1 – 5 above.	Director HR and WHSC Chair
10	Review resourcing in the WHS area	IN-TRAIN GM Corporate Services has been tasked with preparing a Minute to the CEO. Extra resourcing in the HR section is likely with options to be considered.	SF Para 32 (WHS) a	GM Corporate services to prepare Minute to the CEO to confirm (or provide recommendations) about suitability of resourcing for WHS. This should include: • HR section plan/ Org chart;	GM Corporate Services/ HR Director

	ACTION	PROGRESS	REFERENCE IN INSPECTOR REPORT *CA = corrective action SF= Survey feedback	COMMENTS	RESPONSIBLE OFFICER
				• details and skills of WHS staff and how they match their positions; • note around additional resources in agency re WHS such as WHS Committee, HSRs, HCOs, online training etc.	
11	Improve supporting policies and documentation of performance management as well as provide training.	IN TRAIN GM Corporate Services has been tasked with preparing an EMG paper. Substantive work likely to occur in 3rd quarter of FY.	SF Para 32 (Performance Management) a	GM Corporate Services to prepare EMG paper about the need to update performance management documentation and policies and the timeline to report back to EMG with draft materials.	GM Corporate Services/ HR Director
12	Managers are assisted in the performance management process through the HR section	See above	SF Para 32 (Performance Management) b	See above	GM Corporate Services/ HR Director
13	Obtain current and appropriate advice with respect to psychosocial hazards in the workplace and identify contemporary practices and procedures to address hazards.	COMPLETED	N/A	WHS working group members have shared relevant information including: CSIRO's wellbeing journey Comcare - creating mentally healthy workplaces Presentation: CEO National Mental Health Commission on "Be a Safety Champion" (this presentation was forwarded to us by s47F s47F Comcare inspector)	WHS working group

	ACTION	PROGRESS	REFERENCE IN INSPECTOR REPORT *CA = corrective action SF= Survey feedback	COMMENTS	RESPONSIBLE OFFICER
14	Statement of Expectations from CEO to all GM's	COMPLETED Individual letter to GM's (3 pages each) forwarded on 16 September 2019	N/A		CEO
15	CEO to meet with Sue Weston (CEO Comcare)	TO BE COMPLETED – 4TH QUARTER Task with CEO	N/A	To engage with Comcare (in role as new Agency Head) and provide Comcare with summary of steps undertaken following receipt of Comare's Inspector Report in Aug 2019.	CEO
17	Update intranet to include the following "Psychosocial Hazards Info sheet"	IN-TRAIN Director WHS Working Group provided draft to HR for comment on 2/11/19.	N/A		Director WHS Working Group. Draft documents to be provided to Director HR for comment and implementation of final.
18	Register for RUOK day and host an all-staff morning tea with a brief speech from the CEO	COMPLETED Morning tea held on 12 September 2019 in main office as well as regional offices.	N/A	R U OK? Day morning tea communicated externally via Linkedin with short message and photos. Internal communications also included the CEO update as well as the first edition of the WHS WG Staff Update.	Director WHS Working Group in conjunction with Chair WHSC

	ACTION	PROGRESS	REFERENCE IN INSPECTOR REPORT *CA = corrective action SF= Survey feedback	COMMENTS	RESPONSIBLE OFFICER
19	Provide training in conjunction with Safe work month	COMPLETED Training calendar provided to WHS Working Group	N/A		Director HR in conjunction with Chair WHSC
20	Provide ½ - 1 day session for staff involving: • celebrate success/staff achievements • inspirational speaker • Staff section 'speed dating' .	TO BE COMPLETED – 3rd QUARTER Members of WHS Working Group to consider possibilities.	N/A	This session was originally planned for November however is now being considered for the 3rd quarter. WHS WG CPSU delegate contacted s47F who provided a scope of works and cost estimate for consideration. By the 3rd quarter s47F will have completed her first and second round of engagement with staff. At that point in time, she may also be able to provide us with view as to what type of speaker/trainer would be beneficial for this occasion.	Director HR
21	Implement suggestions box	IN-TRAIN Task with Assistant Director HR Operations.	N/A	Assistant Director HR Operations was Acting in the role of the Director of HR when this issue was raised/discussed in ACG meeting on 17/09/19.	Assistant Director HR Operations to provide proposal to WHS WG for consideration.

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Great Barrier Reef Marine Park Authority

WHS WORKING GROUP – CHRONOLOGY

(Period 24 September – 15 November 2019)

DATE	EVENT		NOTES
24/09/19	Meeting	Director, WHS WG Director, HR	WHS Working Group Meeting #4
11/10/19	Meeting	CEO Chair WHSC Director, WHS WG Director, HR CPSU delegate	WHS Working Group Meeting #5
24/10/19	Meeting	Director WHS Working Group meeting with EL1 network	Provide update of work with particular focus on engagement of external consultant
29/10/19 – 1/11/19	Meeting	Director WHS Working Group and Chair WHSC meetings with Health and Safety Reps	Provide update of work with particular focus on engagement of external consultant
05/11/19	Meeting	Chair WHSC Director, WHS WG Director, HR CPSU rep	WHS Working Group Meeting #6
06/11/19	Working Better Together Survey Open	To: All Staff From: Zing & Co	Survey sent to all staff. Survey to remain open from 6-20 November inclusive. Staff strongly encouraged to complete (as of 14 November 139 staff completed)
12/11/19 – 15/11/19	Working Better Together Workshops	All Staff	5 workshops conducted. Approximately 110 staff attended workshops (final numbers not provided as yet)
14/11/16	Presentation	To: EMG From: CEO	EMG presentation #2. Tabled Action Plan as at 13 November 2019.

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INSPECTOR REPORT

COMCARE REFERENCE	MC00010106 -VR01		**Report No.**	1
PCBU DETAILS	**Name** **Address** **ABN** **ACN**	Great Barrier Reef Marine Park Authority 280 Flinders Street, TOWNSVILLE, QLD 12949356885		
REPORT ISSUED TO	**Name** **Position**	Mr Josh Thomas Chief Executive Officer		
COPY OF REPORT GIVEN TO	**Name** **Position**	s47F Director – WHS Working Group		
RELEVANT WORKPLACE/S OR WORKSITE	**Name** **Address** **Date**	Great Barrier Reef Marine Park Authority 280 Flinders Street, TOWNSVILLE, QLD 18 November 2019		
INSPECTOR	**Name**	s47F		
OTHER PERSONS ATTENDING WITH INSPECTOR	**Name** **Position**	s47F Director – Regional Operations Queensland		

PURPOSE

1. In March and April 2019 Comcare received allegations of work health and safety (WHS) concerns relating to psychosocial health and workplace bullying that was reported to have occurred at the Great Barrier Reef Marine Park Authority (GBRMPA) Townsville office.

2. On 29 April 2019, Comcare commenced an Inspection under MC00010106 in relation to the concerns.

3. On 1 August 2019, Comcare issued an Inspector Report for MC00010106, noting the following corrective actions to be considered by GBRMPA and advising that a Verification Inspection would be undertaken:

   a. Identify psychosocial hazards in the workplace in accordance with WHS Regulation 34. Due to the nature of the concerns raised by workers, consideration should be given to engaging a competent person, such as an organisational psychologist, to review psychosocial risks within the organisation including the psychosocial risk factors identified in the report.

   b. Manage risks to health and safety arising from psychosocial risks in the workplace in accordance with WHS Regulation 35.

   c. Implement any risk controls identified in points a. and b. above, to eliminate, and if not reasonably practicable, minimise the risks to health and safety, so far as is reasonably practicable, in accordance with WHS Regulations 35 and 36.

d. Ensure that the controls implemented at point c. are maintained and reviewed in accordance with the WHS Regulations 37 and 38. Consideration could be given to the use of the 'People at Work' package or similar, to monitor and review ongoing psychological health of the workplace.

e. Review and update the bullying and harassment policy and procedure with consideration to the Safe Work Australia document 'Guide for Prevention and Responding to Workplace Bullying'.

f. As identified by GBRMPA representatives, complete and implement the WHS Manual currently being produced.

4. On 18 November 2019 Comcare commenced a Verification Inspection to monitor GBRMPA's progress against the corrective actions identified in Inspector Report MC000010106, and to assess compliance with the *Work Health and Safety Act 2011* (**WHS Act**) and *Work Health and Safety Regulations 2011 (Cth)* (**WHS Regulations**).

OUTCOMES

5. Based upon the review of the information provided during the conduct of the Verification Inspection, the Inspector formed a reasonable belief that the GBRMPA has made substantial progress towards compliance with their duties under the WHS Act and WHS Regulations.

6. The inspection is now closed however Comcare will conduct a further verification inspection in late 2020 to verify the continuing implementation of the corrective actions identified, to confirm compliance with the duties set out in the WHS Act and WHS Regulations and to confirm that the GBRMPA have exercised due diligence to ensure the application and ongoing effectiveness of these controls.

COMPLIANCE ASSESSMENT

7. Inspectors attended the GBRMPA office at 280 Flinders Street, Townsville in the conduct of the Verification Inspection through voluntary agreement.

8. The Inspector noted the following while reviewing the implementation of corrective actions during the Verification Inspection:

a. GBRMPA CEO Mr Josh Thomas has established open channels of communication with staff and has taken action to address the issues raised. As part of the actions undertaken, Mr Thomas wrote to GBRMPA General Managers to outline expectations and obligations relating to psychosocial health matters in the agency.

b. GBRMPA has established a WHS Working Group and appointed a Director to work through the matters identified in the Inspector Report.

c. The WHS Working Group has developed an Action Plan which identifies 21 actions and clearly sets out the actions and progress, with a responsible officer nominated. The working group appears to have comprehensively reviewed the report and has reflected this in the action plan through addressing issues identified by Comcare, staff feedback presented in the report, and other improvements and opportunities identified by the WHS Working Group.

d. The engagement of an organisation workplace dynamic specialist s47F of Zing & Co to conduct a detailed program of work including an organisation wide survey, staff workshops, one-on-one meetings with a sample of staff. From this work and a testing phase, a report will be presented to the CEO and WHS Working Group for consideration.

e. Demonstrated action through the completion of the draft WHS manual and the revised Bullying and Harassment Policy and Procedure. At the time the documents were received, the documents had been provided to staff for comment, with a significant amount of feedback received and considered.

f. Ongoing consultation and communication with staff as the WHS working Group continue with the process of implementing improvements.

9. GBRMPA has acted promptly in addressing the matters raised in the initial Inspector Report. The agency has committed significant effort and both personnel and financial resources in progressing the corrective actions and has ensured that Comcare has been informed and engaged as needed.

10. As a result of the above, the Inspector formed a reasonable belief that the GBRMPA has made substantial progress towards compliance with their duties under the WHS Act and WHS Regulations.

POWER EXERCISED (if any)

Section of Act	Nature of Inspector action/decision
None	Not exercised

COMPLIANCE STATUS OF PREVIOUSLY ISSUED NOTICES (if any)

Notice	Description	Status

REPORT ISSUED BY	**Inspector:**	s47F	**Phone:**	s47F
	Email:	s47F	**Region:**	QLD
INSPECTOR'S SIGNATURE	**Signature:** s47F		**Date:** 14/02/2020	

DISCLAIMER

This report contains information that may assist you take steps regarding your obligations under the WHS Act. You must refer to the Commonwealth *Work Health and Safety Act 2011* (**WHS Act**) and the *Work Health and Safety Regulations 2011* (**WHS Regulations**) to understand your duties and obligations. Comcare's external website contains hyperlinks to WHS Act legislation.

Comcare does not accept liability for any errors or omissions or for any loss or damage suffered by you or any person which arises from your reliance on this report or for any breach by you of your obligations under the WHS Act. Where a Comcare Inspector has inspected a particular workplace is not a representation by Comcare that the particular workplace is in any way free of hazards.

NEED HELP?

Contact the Inspector to discuss any aspect of this Inspector Report. The Inspector should be contacted if you wish to view photographs, documents or other evidence taken by the Inspector if they attended your workplace.

Comcare has a range of publications and fact sheets to help explain your responsibilities and provide guidance to make your workplace safer. The *Compliance and Enforcement Policy* provides guidance as to how Comcare approaches regulation. To access these, visit our website.

REVIEW OF DECISIONS

Where a Decision Maker Review is unsatisfactory, the recipient of the report should seek independent legal advice on review rights.

PRIVACY STATEMENT

Your privacy is important to us. Comcare will only collect, use or disclose personal information in accordance with the Commonwealth *Privacy Act 1988* and if it is reasonably necessary for, or directly related to, one or more of our functions, powers and/or activities. These include functions and activities under the following Commonwealth legislation: *Safety, Rehabilitation and Compensation Act 1988*, the WHS Act, the *Seafarer's Rehabilitation and Compensation Act 1992*, and the *Asbestos-related Claims (Management of Commonwealth Liabilities) Act 2005*. If Comcare does not collect personal information from you, for the purposes of its legislated functions or related functions, we may not be able to respond appropriately.

Comcare is the Commonwealth agency authorised by the WHS Act to collect personal information relevant to the exercise of functions and powers under the WHS Act, WHS Regulations and the administration and evaluation of Comcare's WHS programmes. Any personal information collected in these forms will be used for those purposes.

In exercising our functions and powers, Comcare may disclose personal information, subject to confidentiality of information provisions under the WHS Act, to the following bodies and agencies, including but not limited to:

- Comcare's internal and external legal advisers
- the Safety, Rehabilitation and Compensation Commission
- a court or tribunal
- state or territory work health and safety regulatory agencies
- personnel engaged by Comcare to conduct research related activities
- enforcement agencies or bodies
- state and territory Coroners
- Commonwealth, state or territory industry regulators
- any other person assisting Comcare in the performance of its functions or exercise of its powers, including contractors and consultants
- any other person where there is an obligation under law to do so (for example but not limited to, responding to the direction of a court to produce documentation).

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www.comcare.gov.au | 1300 366 979

From: Josh Thomas
To: s47F
Cc: s47F
Subject: RE: Comcare Verification Inspection Inspector Report [SEC=OFFICIAL] CRM:0019100517 [SEC=UNCLASSIFIED]
Date: Friday, 14 February 2020 7:31:57 PM
Attachments: image001.png
Comcare Verification Inspector Report - MC00010106-VR01 - GBRMPA.pdf

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Dear s47

Thank you for your report. I note your findings and appreciate the care you have taken in understanding and acknowledging the journey we have been on.

Our organisation remains committed to the processes we have established in response to your initial inspection and, indeed, to ongoing improvement of WHS outcomes in general.

Thank you for your professionalism and support throughout the process to date. We look forward to welcoming you back to GBRMPA later this year where we hope to demonstrate further progress on these important matters.

Regards

Josh Thomas
Chief Executive Officer
Great Barrier Reef Marine Park Authority
280 Flinders Street Townsville I PO Box 1379 Townsville QLD 4810
Phone: s47F
Email:

cid:image001.png@01D30483.45E3F2F0

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From: s47F
Sent: Friday, 14 February 2020 4:04 PM
To: Josh Thomas s47F
Cc: s47F

Subject: Comcare Verification Inspection Inspector Report [SEC=OFFICIAL] CRM:0019100517

OFFICIAL

Good afternoon Josh,

Following our meeting in November, Comcare commenced a verification inspection in relation to GBRMPA's progress in addressing recommendations from the inspection regarding WHS concerns around psychosocial issues within the organisation. Attached is the inspector report finalising this verification inspection, apologies for the delay in finalising the report.
Comcare will conduct a further verification activity later this year to continue monitoring GBRMPA's efforts in this area.

Please do not hesitate to contact s47F or myself if you would like to discuss any aspect of the report.

Thanks and kind regards,
s47F

Assistant Director
Regional Operations Queensland | Regulatory Operations Group
Inspector appointed under Section 156 of the *Work Health and Safety Act 2011*

P (s47F
M s47F

Comcare
GPO Box 1993, Canberra, ACT 2601
1300 366 979 | www.comcare.gov.au

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INSPECTOR REPORT – PSYCHOSOCIAL PROACTIVE INSPECTION PROGRAM

GREAT BARRIER REEF MARINE PARK AUTHORITY

24 May 2024

CONTENTS

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EXECUTIVE SUMMARY

Comcare engaged with the Great Barrier Reef Marine Park Authority (GBRMPA) as part of a Psychosocial Proactive Inspection Program. The inspection involved visits by Comcare inspectors to meet with senior leaders, health and safety representatives and workers to the following GBRMPA operational areas:

- Strategic Policy and Partnerships
- Marine Park Operations
- Major Projects
- Chief Operating Officer.

In addition to the abovementioned meetings, Comcare inspected documents provided by GBRMPA.

Comcare assessed of GBRMPA's compliance with work health and safety (WHS) duties concerning psychosocial risks. Based on the information reviewed, Comcare did not identify any non-compliance within the scope of this inspection. However, to assist GBRMPA to continuously improve its health and safety management system, information, advice, and recommendations have been provided throughout this report. A summary of Comcare's findings is presented below.

Comcare thanks GBRMPA for their professionalism and willingness to engage openly and constructively throughout the course of this inspection.

The inspection is now closed.

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Table 1. Summary of Comcare Findings

System Component		Comcare Assessment
WHS management system and psychosocial risks		Non-compliance not found Continuous improvement recommendations 1-4
Objectives and targets		Non-compliance not found
WHS duties		Non-compliance not found Continuous improvement recommendation 5
Risk management		Non-compliance not found Continuous improvement recommendation 6-7
Work design		Non-compliance not found
Mental health wellness support and promotional programs, early intervention and return to work		Non-compliance not found
Training, instruction, and supervision		Non-compliance not found Continuous improvement recommendation 8
Consultation, communication, and coordination		Non-compliance not found
Investigations		Non-compliance not found Continuous improvements recommendation 3,4,9
Other matters enquired into		
Job demands		Non-compliance not found Continuous improvement recommendation 10
Bullying and harassment		Non-compliance not found Continuous improvement recommendation 11

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INSPECTOR REPORT

COMCARE REFERENCE NUMBER	MC00032403
PCBU DETAILS	Name: Commonwealth of Australia in the right of the Great Barrier Reef Marine Park Authority ABN: 12949356885
REPORT ISSUED TO	Name: s47F Position: Manager, Workplace Health and Safety

BACKGROUND

1. Comcare is undertaking a Psychosocial Proactive Inspection Program (‘**Program’**) in accordance with its regulatory functions to provide advice and information on work health and safety (‘**WHS’**) to duty holders, and to monitor and enforce compliance with the *Work Health and Safety Act 2011 (Cth)* (**‘WHS Act’**).

2. As of 1 April 2023, work-related psychosocial hazards and risks are regulated by Comcare pursuant to s55A-55D of the *Work Health and Safety Regulations 2011 (Cth)* (‘**WHS Regulations’**) and under the WHS Act.[1]

3. The scope of the Program is to assess compliance with the WHS Act and WHS Regulations pertaining to the identification and management of work-related psychosocial hazards, and to facilitate compliance (where non-compliance is identified) through the provision of information and advice.

4. Comcare met with representatives from Great Barrier Reef Marine Park Authority (‘**GBRMPA’**) in late 2023 to discuss the participation of GBRMPA in the Program. Following the meeting and in further consultation with GBRMPA representatives, it was agreed that Comcare would undertake workplace inspections in early 2024.

5. Comcare subsequently undertook workplace visits, which comprised engagement with senior GBRMPA leaders (Tier 1), work health and safety personnel and health and safety representatives (Tier 2) and employees and other workers (Tier 3), were conducted at the dates, times and locations listed in Table 2 below.

Table 2. Comcare Inspections to GBRMPA workplaces undertaken for the Psychosocial Inspection Program

Operational Area	Date	Tier	Location
Strategic Policy and Partnerships Marine Park Operations Major Projects Chief Operating Officer	01/02/2024	Tier 1 - Executive Engagement Tier 3 - Worker Engagement	280 Flinders St, TOWNSVILLE

[1] See especially s 19.

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Strategic Policy and Partnerships Marine Park Operations Major Projects Chief Operating Officer	12/02/2024	Tier 3 - Worker Engagement	Online
Health and Safety Representatives	23/02/2024	Tier 2 – HSR Engagement	Online

6. The workplace visits were conducted in accordance with the principles set out in Comcare's *PCBU Guide to the Psychosocial Proactive Inspection Program Pilot.* This document was provided to the GBRMPA prior to the initial visit.

7. In addition to workplace visits, Comcare requested information and documents from GBRMPA, which Comcare subsequently inspected.

8. Comcare thanks GBRMPA for participation in this Program. Comcare wishes to acknowledge the professional, constructive and candid manner in which GBRMPA representatives (workers and senior leaders) assisted Comcare inspectors throughout the course of the visits.

OUTCOMES

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IF YOU DO NOT AGREE WITH A DECISION

If you disagree with the outcome of this inspection, you may seek an internal reconsideration of the inspector's decision. A request for a review should be sent to statutory.oversight@comcare.gov.au including any additional information or evidence you have to support your request. Comcare will review your request and advise of the outcome in writing within 20 business days. If you would like to clarify any aspect of this report, you can contact the inspector directly.

Comcare has a range of publications and fact sheets to help explain your responsibilities and provide guidance to make your workplace safer. The Compliance and Enforcement Policy provides guidance as to how Comcare approaches regulation. To access these, visit our website.

PRIVACY STATEMENT

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Comcare may also need, in accordance with the Privacy Act 1988, and subject to confidentiality of information provisions under the WHS Act, to collect your personal information from, and disclose your personal information to, a number of parties, including but not limited to:

- Comcare's internal and external legal advisers
- the Safety, Rehabilitation and Compensation Commission
- a court or tribunal
- state or territory work health and safety regulatory agencies
- personnel engaged by Comcare to conduct research related activities
- enforcement agencies or bodies
- state and territory Coroners
- Commonwealth, state or territory industry regulators
- any other person assisting Comcare in the performance of its functions or exercise of its powers, including contractors and consultants
- any other person where there is an obligation under law to do so (for example but not limited to, responding to the direction of a court to produce documentation).

It is unlikely Comcare will provide personal information to anyone in an external territory or outside Australia, unless the information relates to an incident, investigation, injury or illness sustained while overseas, or treatment provided by an overseas practitioner. If disclosure of personal information is

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made to someone overseas, Comcare will follow the Australian Privacy Principles that relate to disclosure to overseas entities.

Accuracy of personal information. Comcare wants to ensure personal information is up to date and complete. Our Privacy Policy explains how to access personal information held about you and how to go about making any corrections.

Complaints. If you think Comcare has interfered with or breached your privacy (relevant to the Privacy Act 1988), our Privacy Policy contains information about what you should do and how we will respond.

For a copy of our Privacy Policy, to request a change of your personal information or to make a privacy complaint please refer to www.comcare.gov.au/privacy. You can also contact us on 1300 366 979 or email us at privacy@comcare.gov.au.

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APPENDIX A – Recommendations

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APPENDIX B – Recommended Resources

Resource (hyperlinked)	Remarks	Topic
Safe Work Australia – Model Code of Practice - Managing Psychosocial Hazards at work	Safe Work Australia's Model Code of Practice – Managing Psychosocial Hazards at Work provides guidance to duty holders on how to identify and manage psychosocial hazards. In the absence of an approved Code of Practice in the Commonwealth jurisdiction, the Model Code of Practice provides guidance that is consistent with the Model WHS Act and Regulations.	**Psychosocial Risk Management (primary guidance)**
Comcare - Reducing the Psychosocial Risk of Workplace Change	Comcare's Reducing the Psychosocial Risk of Workplace Change self-assessment tool can support work health and safety risk management during organisational change	**Change management**
Comcare - Change management checklist	Comcare's change management checklist is a self-assessment tool for work health and safety risk management during organisational change	**Change management**
Comcare - better practice EAP resources	Comcare's better practice EAP resources and guidance support employers with the procurement and monitoring of EAP services to improve organisational outcomes and workers' health and wellbeing. Resources include: (1) Principles for Better Practice EAPs, (2) Monitoring and Evaluation Framework for EAP Counselling Services, and (3) Sample EAP Evaluation dashboard.	**Employee Assistance Programs (EAP)**
Respect@Work website	The Respect@Work website by the Australian Human Rights Commission, brings together a comprehensive set of resources to support individuals and organisations to better understand, prevent and address workplace sexual harassment.	**Harassment including sexual harassment**
Safe Work Australia - Preventing workplace sexual harassment guide	SafeWork Australia's Preventing workplace sexual harassment guide supports PCBUs to meet their duties under WHS laws to eliminate and minimise risks to health and safety so far as is reasonably practicable. This includes considering the physical work environment, work systems and workplace policies	**Harassment including sexual harassment**
AHRC - Toolkits	The AHRC's Toolkits and guidance material are designed to help promote diversity and prevent discrimination in the workplace. They provide practical support to develop effective policies and practices in areas including gender equality, sexual harassment, recruitment and retention of older workers, managing employees with family and	**Harassment including sexual harassment**

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	carer responsibilities, workplace cultural diversity and employment of people with disabilities.	
Comcare - Work Demands Guidance	Practical guidance to understand and identify work-related stress, then proactively eliminate, reduce, and manage the risks to prevent harm to workers.	**Job Demands**
SafeWork NSW - Lack of role clarity	SafeWork NSW have published a 'tip sheet' on role clarity, role conflict and work-related stress.	**Lack of role clarity**
Comcare - Lead Indicators Mentoring Program	Comcare's Lead Indicators Mentoring Program trialled the use of a lead indicator tool; the Psychosocial Safety Climate (PSC) was chosen. Given the complexities and misunderstanding surrounding the effective use of lead indicators, the Program was designed to include an employer mentoring component, to build and develop the capability of employers and leaders to reduce the risk of WHS harm, through the implementation of the PSC Framework. PSC refers to the corporate climate for psychological health, and concerns the priorities, policies, practices and procedures an organisation has to prevent stress and psychological harm.	**Lead indicators**
SafeWork NSW - Levels of control and work-related stress	SafeWork NSW have published a 'tip sheet' on Levels of control and work-related stress.	**Low job control**
National Mental Health Commission - Mentally Healthy Workplaces beta site	The Mentally Healthy Workplaces beta site (open for feedback) by the National Mental Health Commission provides a nationally consistent approach to workplace mental health and a one-stop shop of curated high-quality resources, advice and tools from a range of organisations. The platform contains a collection of learning modules on the core elements of a Mentally Healthy Workplace and allows users to track their progress.	**Mental health**
SafeWork NSW - Organisational justice and work-related stress	SafeWork NSW have published a 'tip sheet' on organisational justice and work-related stress.	**Organisational Justice**
People at Work	People at Work is a free and validated Australian psychosocial risk assessment survey, that assesses a number of the most common psychosocial hazards and factors. The survey forms part of a five-step process to identify, assess and control risks to psychosocial health at work. It is a collaboration between and jointly funded by Australian work health and safety regulators.	**Psychosocial Risk Assessment**

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SafeWork NSW - Recognition and Reward	SafeWork NSW have published a 'tip sheet' on recognition and reward and minimising work-related stress.	**Reward and recognition**
Respect@Work - Celebrating positive behaviours in organisations	Respect@Work has a page with practice examples of how to recognise and reward positive behaviours in the workplace.	**Reward and recognition**
Comcare – Mental Health Stigma	Comcare website has a page detailing mental health stigma in the workplace and how employers and managers can reduce it. Beyond this, there is some new guidance on the way	**Stigma**
APSC - Compassionate Foundations – Suicide Prevention Capability Suite	Compassionate Foundations – Suicide Prevention Capability Suite by the Australian Public Service Commission, is a foundational, virtual and self-directed (approximately 4 hours) suite designed to support positive human-to-human interactions that promote connection and understanding. The purpose of the suite is to help participants respond early and before a person's experience leads them to become distressed and/or suicidal. These skills include being compassionate, being aware of the needs of people in vulnerable situations, understanding why people may become distressed and knowing how to have a helpful and safe conversation with someone who may be showing early signs of distress.	**Suicide Prevention**
Comcare - Good Work Design	Comcare's Good Work Design videos and resources help to build manager capability for designing good work for participation and productivity, via a suite of ten micro learning videos and written resources. The resources translate the evidence of good work design into practice and complement the Safe Work Australia Good Work Design Principles. The theme of the resources is 'What great managers do'.	**Work design**