



HEALTH AND SAFETY AT WORK STRATEGY

Feedback Form | April 2018

What we're consulting on

We are seeking **your feedback** on a draft Health and Safety at Work Strategy (**the draft Strategy**), beginning in 2018 and setting the aspirations for the New Zealand health and safety system over the next ten years. Your feedback will help to refine and improve the Strategy before the Government makes any final decisions.

You can find the **consultation document** with information about the draft Strategy at:

<http://www.mbie.govt.nz/info-services/employment-skills/health-and-safety-at-work-strategy>

What we're asking

To help focus your feedback, we have **10 questions**. You are welcome to respond to some or all of the questions. Where possible, please include **evidence** to support your views, for example references to independent research, facts and figures, or relevant **examples**.

How to give your feedback

- **Submissions are open until 5 pm on 8 June 2018**
- Send this completed form as a **Microsoft Word** document or **PDF** to: HSWStrategy@mbie.govt.nz
- **Include** your name, or the name of your organisation, and contact details

Alternatively you can post your submission to:

Health and Safety at Work Strategy
c/o MBIE – Health and Safety Policy
PO Box 1473
Wellington 6140
New Zealand

Send any questions you have in relation to the submissions process to: HSWStrategy@mbie.govt.nz.

Further information

The **consultation document** contains information about how your submission will be used, including private information you supply (page 17).

Further detail about the draft Strategy, including a **supporting document** with further information, is at: <http://www.mbie.govt.nz/info-services/employment-skills/health-and-safety-at-work-strategy>



Q1 Does the Strategy set a clear and ambitious direction? Why or why not?

While the Strategy does set a clear direction, it should identify and target areas of poor performance. This will entail a greater emphasis on measurement of reliable data and a clear understand of what "poor performance" looks like. This will mean analysing performance on less traditional measures such as events/incidents that are precursors to fatalities or serious harm.

Q2 Does the Strategy provide a platform for better coordination and alignment? Why or why not?

Yes it does. While measurement will be the key, the Strategy does provide for shared ambition and direction for improving health and safety.

Q3 Does the Strategy focus on the areas and people that will make the biggest difference? Why or why not?

There is no doubt that lifting the performance of small and medium businesses will have the biggest impact on improving health and safety outcomes. The focus on workers at greater risk however is a reflection of the industries they work in and the focus should be on these industries and jobs rather than on the demographic group of workers.

Q4 Does the Strategy provide clarity about roles and responsibilities?

Why or why not?

The focus on stronger sector leadership is important as any improvements will need to be sector-led. The focus on workers is also important, however ensuring engagement, participation and representation should also include accountability to engage and participate. Workers should also be responsible, along with employers, for complying with Health and Safety Systems and procedures.



Q5 Does the Strategy take into account the best information we have?

Why or why not?

There may be information collected by industry groups and sectors that would help inform the Strategy. As an example, the Extractives Sector, through their Health and Safety Council, MinEx, collect information for sharing within their sector that may help inform this strategy. Other industry bodies and groups may collect similar information.

Q6 Does the vision describe what you think our health and safety system should achieve?

Why or why not?

See Page 9 consultation document

In general Yes, however we recommend the following changes:

- 1) The first priority should be on effective risk management **systems**, as these will vary depending on the industry, work type, and workforce. The term risk management is narrow, and implies a standard theoretical approach for all businesses.
- 2) Lifting specialist skills will not necessarily improve health and safety outcomes for SMEs. Here we need to lift ownership within these SMEs through improving skills and knowledge within these businesses. This can be achieved through existing, and new, sector led bodies delivering training and support through industry-led networks.

Q7 Are these the most useful goals?

Why or why not?

Pages 10-13 consultation document

In general Yes, however support for workers with greater need should be replaced with support for workers in industries with a greater risk of injury and illness to their workers. The focus on workers at greater risk however is a reflection of the industries they work in and the focus should be on these industries and jobs rather than on the demographic group of workers.



Q8 What would make the biggest difference in each priority area?

Pages 10-13 consultation document

Support for industry associations, and/or sector Health and Safety Councils, to promote and support worker driven improvements in health and safety. Examples here are work done by CCNZ, FISC and Minex in the Civil Construction, Forestry and Extractives sectors.

Greater involvement, engagement and participation of workers in developing effective risk management systems. This should also include accountability of management and workers to ensure instructions and procedures aimed at improving safety in the workplace, are followed.

We do not need more health and safety professionals or consultants. Industry leaders and support staff, including SMEs, need improved skills and knowledge in developing and implementing effective safety management systems. The focus needs to be on educating managers who are responsible for, and make decisions, on health and safety.

There will be a need to have technical expertise in health and safety management systems, however we do not want to creep backwards to where only H&S professionals do safety. H&S professionals need to be focussed on compliance management, not operational safety.

Q9 Are these the measures we need to know if the system is working better?

What else do we need to know?

Page 14 consultation document

We need to know what events or incidents are occurring that, but for other circumstances (such as luck), could have resulted in a fatality. Focussing on these events will identify the precursors to fatalities and serious incidents, which will enable each sector to concentrate on the critical controls necessary to avoid death or serious injury from such events.

Organisations need to bench mark themselves, and share near misses and other safety alerts, so that all businesses learn from each other. This needs to be sector driven, and supported by WorkSafe as a medium for sharing across sectors.

There needs to be a greater focus on lead indicators. While tracking lag indicators does have a place, this strategy represents a real opportunity to educate proactive behaviour by setting, and tracking, lead indicators.

Q10 Who needs to be involved in turning the Strategy into action?

What can you do?

Page 15 consultation document

The strategy needs to be sector-driven therefore industry bodies, workers, unions and health and safety councils from each sector need to be involved in action plans for their sector. While the strategy creates a shared ambition, actions need to be industry/sector specific, reflecting the needs of each sector.

Any other comments?

Complexity needs to be reduced, and communication/language simplified, particularly for SMEs and sectors where language and literacy issues exist.

Central and Local Government need to review procurement practices to include requirements for, and review of, compliant health and safety practices within potential suppliers. When assessing potential suppliers of goods and services, health and safety should be a major consideration in the procurement process.