



28 April 2011

Mr Jim Beck
Director Licensing Services
Workplace Health and Safety Queensland
Department of Justice and Attorney-General
PO Box 69
Brisbane QLD 4001

Submitted via email: paul.waltham@justice.qld.gov.au

Dear Mr Beck,

Re: Consultation on Health and Safety Representative Training

The Chamber of Commerce and Industry Queensland (CCIQ) welcomes the opportunity to provide feedback on the consultation draft papers for the Health and Safety Representative (HSR) Training Underpinning Principles and Learning Outcomes. CCIQ remains strongly supportive of harmonising Workplace Health and Safety (WHS) systems across jurisdictions in order to reduce red tape and costs on businesses. This includes nationally consistent HSR training that ensures HSRs are confident, competent and capable in performing their duties and exercising their powers under the new Act and regulations.

Under the current draft regulations, there are no prerequisites for becoming a HSR, other than to be an elected member of a work group. Employers have concerns around the competency levels of workers who are elected as HSRs, particularly following the removal of the requirement for Workplace Health and Safety Officers (WHSOs). Subsequently, CCIQ remains supportive of allowing person's conducting a business or undertaking (PCBU) to have some say in who is chosen to fulfil the role of HSR, and for this person to have minimum requirements in relation to experience, qualifications and/or time that they have been with the business. It is also essential that the underpinning principles of HSR training and learning outcomes reflect the needs of the industry to ensure it is invaluable in achieving an outcome that is optimal for both the employer and employees in the workplace.

In the consultation draft of the underpinning principles, CCIQ notes that the first underpinning principle is that HSRs are not formally assessed. However the Queensland Government has announced their intention to have two training pathways in Queensland; the national non-competency based training pathway in addition to a competency based training pathway. CCIQ is seeking clarification around why the two training pathways are being considered in Queensland. It is essential that the approach taken in this state does not undermine the national harmonisation process. Two training pathways could result in:

- Queensland being inconsistent with regards to the qualifications of HSRs, which could create issues of mutual recognition for Queensland HSRs seeking to work in other jurisdictions and visa versa;
- Queensland employers being confused over which training pathway their employees should follow and why;
- Different pay expectations for employees who have a Statement of Attainment/qualification in this area of speciality;
- Different levels of achievement for HSRs within the one organisation.

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Overall, CCIQ stresses the importance of maintaining the quality and integrity of the HSR training processes throughout the country in order to preserve the credibility of the occupational outcome. The Chamber is supportive of the following in order to deliver this outcome:

- The learning outcomes for HSR training must link directly back to references of competence in the model WHS regulations to ensure HSR are confident, competent and capable in these areas;
- The HSR training framework needs to be prepared under the national training framework with quality assurance processes to guide the development and delivery of training;
- Competencies need to align and be developed in accordance with industry standards. This must include consultation with Industry Skills Councils;
- Competencies need to be able to be modified if required;
- All qualifications or units of competency need to have recognition Australia wide;
- Training delivery conducted by RTOs is governed by a regulatory framework to ensure consistency and quality;
- HSR training should be delivered by RTOs not unions;
- Existing HSRs should be provided with a reasonable transition period in which they should attend refresher training in order to up-skill to the new legislation and requirements.

If you have any questions regarding this correspondence, please do not hesitate to contact CCIQ Policy Analyst Leanne Usher on (07) 3842 2237. CCIQ looks forward to working with the State Government to assist the Queensland business community in transitioning to the new WHS system from 1 January 2012.

Yours sincerely,



Nick Behrens
General Manager - Policy