Insight aims to provide useful information, links and tips in the areas of Risk Management, Work Health and Safety, Business Continuity Management, and other areas relating to management systems and corporate governance.

But what about the basics?

With an array of safety culture and safety maturity programs being touted within the Industry, we are seeing organisations turn their attention to the tackling safety culture often at the expense of the safety management system.

Concerning recent trends have emerged in audits of late, with regulatory requirements being missed or overlooked, systems documents not being maintained, breakdowns in training compliance, and gaps in workers' understanding of their basic safety responsibilities. These are all key foundations of a WHS Management System. The gaps are sometimes even glossed over by the internal stakeholders, who often believe that the work being undertaken in the safety culture space will address it. Unfortunately, it won't.

A safety management system provides the fundamental framework of processes that enables and supports the effective management of health and safety risks, but these processes need to be reinforced and maintained.

Whilst Safety Culture programs are useful, they have their time and place in the spectrum of safety improvement work, especially in supporting work to address the management of psychosocial hazards. However, for these to be effective, there also needs to be a solid foundation of an embedded management system to ensure legislative compliance requirements are in place, risks are being identified and managed, and the responsibility for managing WHS is affirmed.

It's also not a matter of considering the system as done and in place, so therefore all attention can move onto the safety culture work.

A management system is not a set-and-forget process. It's not even a set 'and I only need to commit 10% of my time to maintain it' type of process. Without these fundamentals being regularly reinforced and well maintained, all the management processes become ineffective. If compliance is done correctly, it should see safety maturity move through the Hudson's Safety Culture Maturity stages from 'Pathological' to the 'Reactive',

the 'Calculative' and hopefully the 'Proactive' and then 'Generative' stages.

As we near the end of 2025 and new year approaches, it may be timely to consider what planning needs to be put in place to ensure that the management system is addressing all the regulatory requirements, that the entire workforce has a good understanding of what they are responsible for, and how the management system supports and aids them to fulfil their responsibilities.

Please contact QRMC for more information.

WHS Trends and Challenges

As the saying goes; "the only constant is change". The WHS landscape in Australia is no different: it is a continually shifting environment across Australian jurisdictions.

Regulators, industry, and workplaces are addressing both traditional safety risks and new challenges, including emerging hazards, legislative updates, and changes related to workplace culture, wellbeing, and technology. Some of these include:

National Research Priorities: A Smarter, More Inclusive Approach

Safe Work Australia recently released its updated *WHS & Workers' Compensation Research Strategy,* highlighting five priority areas:

- Shifting mindsets around fundamental duties,
- Prevention of psychosocial harm,
- Advancing technology,
- The changing nature of work, and
- System effectiveness.

Particularly notable is the emphasis on 'vulnerable workers' as cohorts with higher risk profiles – people with a disability, older people, young people, migrants, shift workers, as well as women and gender-diverse workers in male-dominated industries.

Safe Work Australia also evaluated regulatory frameworks, identifying where gaps exist and exploring how harmonisation can be improved.

Regulatory Change & Legislative Reform

There were several legislative changes of note implemented in 2025:

- In Queensland, the priorities shifted somewhat under the LNP government. The previous government's mandated Sexual Harassment Prevention Plans came into force, but a raft of HSR-related amendments were tabled, and the requirements for audiometric testing were enhanced.
- The new WHS Regulation in NSW became effective in late August, with a range of administrative-type amendments and the strengthening of requirements to manage psychosocial risks using the hierarchy of controls.
- The NSW Government will implement major fire safety regulation changes on 13 February 2026, following updates to the Environmental Planning and Assessment Regulation 2021, that will require building owners to apply mandatory procedures for maintaining fire safety measures in accordance with Australian Standard AS1851-2012 or the relevant performance solutions. For details refer to the NSW Government Reforms to building fire safety regulation.
- Victoria is still operating differently to the other states which have adopted the harmonised

model WHS laws. They are also exploring different WHSMS auditing requirements for self-insured organisations.
- Across the board, a number of jurisdictions had a heightened focus on engineered stone, with new codes of practice and imposed silica dust exposure standards.
- All Australian jurisdictions have enacted some form of regulations covering psychosocial hazards, requiring workplaces to put in place preventive systems and controls, as well as strategies to manage the mental health and wellbeing impacts should an incident occur.

The challenges ahead for 2026

- Managing psychological injury and workplace behaviour and understanding the Regulator's position in relation to the requirements. Legal decisions will provide a fertile ground for learning how the requirements are interpreted and the extent to which the controls need to be operationalised and embedded in Job design.
- Non-traditional work arrangements (gig work, remote work, shift compression) increase complexity in duties, reporting, and safety culture.
- Technology provides safety tools but also creates new risks. Automation, AI, robotics and autonomous systems are being more widely adopted, prompting questions over how WHS laws will address these.
- Gaining a greater understanding of a PCBU's shared duties, and how these requirements should be enacted.
- Managing these challenges, and the traditional WHS risk exposures, within the current economic pressures, with resource limitations and operational requirements.

Please contact QRMC for more information.

Holiday Wishes

This edition of *Insight* is the final for 2025. The first edition in the New Year will be issued in February 2026.

QRMC Risk Management Pty Ltd will be closing over the Christmas period, from close of business Friday 19 December, reopening Monday 5 January 2026.

QRMC wishes all our clients, supporters and readers a relaxing, happy and safe holiday season. We look forward to your company in the New Year!