

Welcome to the first 2026 edition of *Insight*. *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.

Reflections on the Managing Psychosocial Hazards at Work Code of Practice (Part 1)

In this three-part series on the impact of the [Managing the Risk of Psychosocial Hazards at Work Code of Practice](#), we will look at what changes have been brought into effect due to the Code, but also take a deeper dive into some of the extensive guidance information that the Code provides.

Since its publication in April 2023, Queensland's *Managing the Risk of Psychosocial Hazards at Work Code of Practice (2022)* has reshaped how businesses think about workplace safety - putting psychological health on a par with physical health and safety in legal duties and everyday operations. The Code, introduced under the *Work Health and Safety Act 2011*, was the first legally enforceable psychosocial hazards code of its kind in Australia, giving employers clear, practical steps to identify, assess and control psychosocial risks like stress, bullying, harassment, poor job design and other workplace pressures.

One of the most significant impacts for Queensland businesses in the nearly 3 years since its release, is the shift from "passive compliance" to "proactive risk management". The Code requires all employers, from small enterprises to large corporations, to adopt a systematic risk-management approach for psychosocial hazards. This means identifying hazards, assessing risk levels, implementing controls and reviewing effectiveness in much the same structured way physical hazards are handled. It also explicitly applies to all workplaces covered by the WHS laws, including contractors and volunteers, and makes clear that organisations must either comply with the Code or demonstrate an equally effective alternative approach.

For many businesses, this has entailed cultural and operational change. Employers are investing more in mental health training, as well as communicating and consulting with workers to understand how workplace design, management practices and interpersonal behaviours can affect staff wellbeing.



Consultation and worker involvement are core features of the Code's guidance, helping organisations tailor risk controls that suit their context, operations and importantly, their workforce.

From a legal and compliance perspective, the Code forms part of the evidence that Regulators use when assessing whether a business has met its legal obligations. This has encouraged more organisations to document their psychosocial risk strategies and to integrate them into broader health and safety systems to mitigate the risk of enforcement action, workers' compensation claims or reputational harm.

There have also been positive business outcomes linked to the Code's adoption. Many employers report improvements in workplace morale, reduced conflict and more open dialogue about mental health and wellbeing. Proactive psychosocial risk management can lead to lower absenteeism and increased productivity as staff feel safer and more supported - a benefit highlighted by Regulators and workplace advisers as one of the key incentives for compliance.

However, challenges remain. Smaller businesses in particular have noted the resource and knowledge burden of implementing structured psychosocial risk processes, especially where dedicated WHS expertise is limited. Whilst the Code clarifies obligations, it also increases expectations on employers to understand and act on complex psychological risk factors.

Overall, Queensland's *Psychosocial Hazards Code of Practice* has pushed businesses toward more mature, legally anchored and proactive approaches to mental health and wellbeing, shifting

both organisational culture and regulatory practice across the state.

In next month's *Insight*, we will explore the Code in more detail, highlighting the extensive guidance available to support organisations in identifying psychosocial hazards in the workplace.

Please [contact QRMC](#) for more information.

Sexual Harassment Prevention Plans – One Year On

It is now one year on from the introduction on the 1st of March 2025 of the Queensland legislative requirement for workplaces to have a *Sexual Harassment Prevention Plan* under the Section 55H amendments to the *Work Health and Safety (WHS) Regulation 2011 (Qld)*. This change was part of a broader shift in the state's WHS laws, requiring employers and other persons conducting a business or undertaking (PCBUs) to proactively manage and prevent sexual harassment and sex or gender-based harassment at work, not merely respond after an incident has occurred.

As part of QRMC's auditing activities, the lack of a written, communicated and implemented *Sexual Harassment Prevention Plan* is something that has come up as a regular finding. Given that the March 2025 timeline was for the Plan to be in place, it is concerning that one year on, organisations are still not meeting their legislative compliance requirements in this space.



What the Law Requires

Under Section 55H of the *WHS Regulation*, a PCBU must prepare and implement a written Prevention Plan addressing risks of sexual harassment or sex or gender-based harassment in the workplace. The Plan must:

- State each identified risk of sexual or gender-based harassment.
- Describe the control measures implemented (or to be implemented) to minimise or eliminate these risks.
- Explain the matters considered in deciding control measures, such as workplace culture, diversity, and other relevant factors.
- Outline consultation with workers in developing the Plan.
- Set out procedures for reporting, investigating and resolving complaints, including how workers can make a report and how investigations are handled.
- Be readily accessible and understandable to all workers.

PCBUs must also take reasonable steps to ensure workers know about the Plan, and it must be reviewed regularly, including after a complaint, or when requested by health and safety representatives or committees, or at least every three years.

Why It Matters

Rather than relying solely on reactive responses or on federal anti-discrimination law, Queensland's legislated WHS framework now firmly embeds sexual harassment risk management into everyday safety practices. Employers are required to treat sexual harassment risks with the same structured risk management approach used for physical safety risks, ensuring they have clear, documented work processes for identification, response and management, and that workers are informed and protected.

Compliance and Consequences

Failure to prepare, implement or review a compliant Prevention Plan can result in significant penalties under the WHS laws, including fines for each breach. WorkSafe inspectors are actively enforcing the new rules, and businesses without a written Plan can face on-the-spot fines and other regulatory action.

In summary, Queensland's legislative requirement for Sexual Harassment Prevention Plans represents a proactive, structured and enforceable approach to preventing sexual and gender-based harassment at work, strengthening protections for employees and clarifying employer obligations under WHS law. If your organisation hasn't implemented their written Plan yet, QRMC can assist in this area to ensure you meet your legislative compliance requirements. Please [contact QRMC](#) for more information.