

*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.

## When “Functional English” Becomes a Safety Variable

In August 2025, the Australian Government recalibrated its English language requirements for certain visa categories. While presented as a technical alignment across testing systems, there was a practical impact for “functional English” thresholds, that is, the English proficiency, of the pool of international workers entering Australia.

From a WHS perspective, the potential for ‘culturally and linguistically diverse’ (CALD) workers or work groups having more limited English language proficiency inadvertently heightens the challenge of communicating with staff onsite, and has the potential to expose several critical vulnerabilities, such as the potential for:

- Reduced effectiveness of traditional training and induction processes.
- Reduced effectiveness of formalised WHS communication processes such as toolbox talks, prestart discussions and written safety notices.
- Reduced effectiveness of the informal communications with colleagues & HSRs.
- Reduced confidence in the level of understanding in relation to safety instructions, JSA or SWMS (this is also accounting for the scenario where a worker may sign off the SWMS but without fully understanding the detail within).
- Increased workload on the supervisory personnel to compensate for communication gaps by spending more time repeating instructions, demonstrating instructions and verifying the workers understanding of these instructions.



- Reduced confidence in the hazard reporting and incident reporting processes, not only from a possible failure to understand, but also from cultural differences such as a deference to authority and a hesitation to speak up.

Australian industry statistics indicate that the more at-risk industries (for WHS incidents) include Construction, Manufacturing, Agriculture & Logistics. These sectors typically involve hazardous, complex, and fast-paced work. WHS Legislation requires that PCBUs must ensure (*so far as is reasonably practicable*), that workers understand safety information and instructions, and comply with them. Therefore, the burden for addressing any potential communication gaps rests squarely on employers.

Where this risk is identified, organisations should review and adapt their induction, training, and communication processes, implement appropriate language support measures, and strengthen verification activities to confirm that the controls implemented are effectively managing the risk.

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

## Organisational Change, Job Insecurity and Psychosocial Hazards

Organisational change has become a constant feature of modern workplaces, driven by economic pressures, technological advancement and evolving business models. While change can deliver efficiency and growth, it also presents significant WHS risks – particularly in the form of psychosocial hazards linked to job insecurity and uncertainty.

Psychosocial hazards arise from the way work is designed, managed and experienced, and during periods of organisational change (such as restructures, mergers, downsizing or role redesign) workers are exposed to increased stress, ambiguity and reduced control over their work environment.

Job insecurity is one of the most significant risk factors in this context. When workers are uncertain about their future employment, income stability or role expectations, it can lead to heightened anxiety, reduced morale and disengagement. And when workers are disengaged, there is a subsequent correlation to safety concerns and incidents not being reported, particularly if there is a fear of negative consequences or job loss. As a result, risks can go unmanaged and safety performance can deteriorate.

Workload and job demands often increase during organisational change. Remaining workers may be required to take on additional responsibilities, learn new systems, or adapt to unfamiliar roles with limited training or support. This can lead to cognitive overload, fatigue and a higher likelihood of errors. Poorly managed change processes such as inadequate consultation, unclear communication or lack of leadership support, can further exacerbate these risks.



Importantly, WHS legislation requires employers to manage psychosocial hazards by identifying potential hazards, assessing the level of risk and implementing reasonably practicable control measures. In the context of organisational change, this means actively considering how proposed changes will impact worker wellbeing and taking steps to minimise harm.

Effective controls may include transparent communication, genuine consultation with workers, and providing clarity around roles and expectations. Access to support services, such as employee assistance programs can also help mitigate the impact of stress and anxiety. Training for managers is critical to ensure they can recognise signs of psychosocial risk and respond appropriately.

Organisations that fail to manage organisation change leave themselves exposed in terms of legal consequences, as well as reduced productivity, increased absenteeism, and higher staff turnover. Conversely, organisations that adopt a proactive and people-centred approach to change are more likely to maintain trust, engagement, and safety performance.

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

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