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Chair
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Dear Dr Jacobs

Submission to Education And Health Standing Committee Inquiry into Mental Illness in Fly-In, Fly-Out Workers – Response to Discussion Paper

UnionsWA is the governing peak body of the trade union movement in Western Australia, and the Western Australian Branch of the Australian Council of Trade Unions (ACTU). As a peak body we are dedicated to strengthening WA unions through co-operation and co-ordination on campaigning and common industrial matters. UnionsWA represents around 30 affiliate unions, who in turn represent approximately 140,000 Western Australian workers.

UnionsWA welcomes the opportunity provided by the Education and Health Standing Committee to comment on the Discussion Paper 'Shining a Light on FIFO Mental Health'. Mental health is a workplace health and safety issue, and it is clear from the Paper that there are serious mental health issues facing fly-in fly-out workers.

As stated in a report by Anglicare Australia that we quoted in our initial submission to this inquiry:

*Mental health, depression and stress-related problems associated with the fly-in, fly-out workforce are common. Kennedy (2011) finds that some people working fly-in, fly-out become isolated and lonely, often having difficulties managing the house or family when they return home. It's no small challenge to work for up to six weeks at a time and then try to re-establish family relationships - particularly when everyone is aware that the separation soon begins all over again.*¹

We agree with the observation in the Chairman's forward to this report stating that

... there are anomalies in workplace regulation in respect to jurisdiction as well as site and activity, and uncertainty in mine safety regulations pertaining to mental health.

Below are UnionsWA's responses to the Committee comment contained in the Discussion Paper. Broadly we believe that both state and federal governments need to urgently take the initiative on dealing with FIFO and mental health, especially as the recommendations contained in the House of

¹ Anglicare Australia, *STAYING POWER: Anglicare Australia's State of the Family Report*, Anslie, October 2011, pp. 47-48.

Representatives report *Cancer of the Bush or Salvation of our Cities?* have still not been acted upon. The Standing Committee has a unique opportunity to take the lead on this issue by making robust and far reaching recommendations.

Committee Comments

It is clear that FIFO work practices will remain a feature of the Western Australian employment landscape into the future. There was very little indication, based upon the submissions made to the inquiry, of an appetite to end FIFO, but there was a clear view that FIFO work practices could be improved to provide better protections for workers' mental wellbeing.

The Committee is also aware of concerns about the challenges created by FIFO practices for host communities.

(Ch. 1, p.8)

UnionsWA response

While appreciating that FIFO practices are not going to disappear from WA, it is important that they not be 'normalised' either. That is to say – FIFO should not be the default choice for work arrangements in remote areas. Active preference should always be given to building communities in regions where resource and other developments are being built and operated.

Mental health demographics and the FIFO workforce

The resources industry predominantly employs people in the age-range that is most at risk of mental illness and particularly those mental illnesses described as "affective disorders", including depression.

(Ch. 2, p.15)

The resource industry's reliance upon male workers results in the employment of individuals with a heightened risk of suicide compared to female workers.

(Ch. 2, p.17)

Even with regard to the variability of data on the issue, the resources industry predominantly employs people in the age-range that is most at risk of suicide.

(Ch. 2, p.19)

The Committee notes that the resources industry employs large numbers of people with education levels and occupational profiles identified as at risk of mental health problems and suicide, such as construction workers, labourers, and skilled tradespeople.

(Ch. 2, p.21)

UnionsWA response

The Committee's comments correctly establish that there is an obvious and assessable risk factor for suicide among the FIFO workforce. This is not new information, and employers in the industry should have no need for an inquiry to inform them about these risks.

It should be recognised that if an employer utilises FIFO work practices that they also own the duty of care to inform themselves about the risks entailed. Instead a flippant disregard of the obvious risks of FIFO work has been displayed by some employers.

The Committee should recommend that, given these are known risks, the obligation should be on resource industry employers to take more proactive steps to address suicide risks within the FIFO workforce.

If adequate amenities aren't provided and appropriate steps aren't taken to address these issues, the committee should consider legislative options to mandate minimum conditions in camp accommodation.

Characteristics of the FIFO Lifestyle

The length of time spent on site contributes to the remoteness and social isolation experienced by workers. A worker on a lower compression roster (for example, eight days on and six days off, or an even time roster) will have more time at home, and greater opportunities to be connected with family and friends, than a worker operating under a higher compression roster (for example, four weeks on and one week off).

Limited time spent away from site also limits opportunities to seek mental health assistance away from site.

(Ch. 3, p.25)

UnionsWA response

When negotiating and designing rosters for the FIFO workforce, lower compression rosters should be the norm in the industry. Industry wide standards should set out clear and enforceable limits on roster arrangements to prevent 'compression creep' (that is the gradual ratcheting up of days on over days off).

Travel time has the potential to encroach on the amount of time that a FIFO worker spends with family and friends and may therefore be a factor contributing to risks of disconnection and social isolation.

(Ch. 3, p.25)

UnionsWA response

Rostering arrangements should take account of the time spent travelling to and from worksites when considering what constitutes time-off for workers. Employers should be prevented from engaging in 'time-theft' of precious time off work. For example, a roster of six days off should mean exactly that – six days. Travel time to and from worksites should be considered working time.

There should be an obligation that employers take this into account especially when the resource sector seeks to employ workers from interstate and in particular interstate regional centres. The long held policy that once an employee is on a plane, the employer is absolved of responsibility is antiquated and should be replaced with a broader duty of care to the workforce.

The Committee would welcome additional information about the impact of FIFO work arrangements on families, as well as the risks associated with reduced engagement with family life upon the mental wellbeing of FIFO workers.

(Ch. 3, p.27)

Given the impact of rosters on the ability of workers to remain engaged in their family and social lives, and given the documented psychological consequences of social disconnection and isolation, the Committee is of the view that good communications services are essential to the mental health and wellbeing of the FIFO workforce.

(Ch. 3, p.29)

UnionsWA response

As the AMWU argued in its submission to the inquiry, phone and internet services are a worker's lifeline when working in remote locations. Companies which build and operate major resources projects in remote areas do not accept 'isolation' as a reason to withhold investment in corporate and business related communications. Overcoming social isolation in the workforce should have a higher priority given the acknowledged and well known mental health risks of FIFO work.

On the evidence made available to the Committee, a stigma associated with mental health pervades the resources sector, particularly because of the 24x7 nature of FIFO. This stigma is a significant workplace cultural issue and is a major barrier to encouraging help seeking behaviour amongst the FIFO workforce.

(Ch. 3, p.31)

The problem for the resources sector is that the perception of adverse consequences associated with reporting mental health concerns is reportedly preventing employees from taking action to address their problems.

(Ch. 3, p.33)

It has been reported to the inquiry that people have stopped taking their anti-depressant medication, or have not commenced taking it, as a result of fear of adverse consequences for their employment should their use of medication be discovered.

It is essential that stigma and the associated fear of disclosure of mental health problems are eliminated from the workplace and that FIFO workers are able to get the treatment they require for their illness.

The Committee intends to gather further information on drug screening procedures and processes during the next phase of the inquiry.

(Ch. 3, p.34)

UnionsWA response

It is a well-founded fear amongst FIFO workers that some employers will use a fitness for work policy to remove workers from site if it is disclosed that they have a mental health issue.

While we acknowledge the need for fitness for work procedures, an appropriate balance needs to be struck to ensure that workers with mild mental health issues can seek and access appropriate support without fearing repercussions from employers.

The stigma of acknowledging mental health issues is a mental health risk in and of itself. It is not enough to just say that programs are available but 'underutilised' – as if that is the end of the employer's responsibility. The stigma issue is a 'known known' alongside other mental health risks, and the industry should have a comprehensive strategy to address it.

The CFMEU expressed the view that more should be done to protect individuals in camp arrangements from bullying and harassment. Given the reluctance of many employees to make formal complaints to DMP, this is not an exclusively regulatory problem. The reluctance of employees to come forward is connected to the same workplace cultural problems that create fear and stigma about mental health issues.

Addressing bullying will require collaboration between employers, employees, unions, and the regulator.
(Ch. 3, p.36)

UnionsWA response

Part of the reluctance of workers to make formal complaints to DMP is their lack of faith in the Department's effectiveness as a regulator. As the Committee acknowledges in its comment on page 85 of the Discussion Paper, the DMP is reliant on companies reporting *to it* in the first instance before investigations can even occur, let alone be effective.

The DMP is not an effective regulator in this matter, and the Committee's recommendations should address this issue by recommending that adequate resources are given to WorkSafe and the DMP to be pro-active inspectorates.

The Committee acknowledges that women working FIFO have a range of specific challenges, and would welcome further information on the particular mental health issues that women face while doing this form of work.
(Ch. 3, p.37)

UnionsWA response

The Committee correctly notes 'that women find working within a male dominated environment particularly challenging'. Given this situation, the inquiry final report should include a recommendation that the Federal government resist pressure from business to water down current workplace gender equality reporting requirements. The Committee has made mention of the lack of information on the FIFO workforce generally, and information on women in FIFO needs especially to be as comprehensive and accurate as possible.

Alcohol is often used as a non-effective coping mechanism by FIFO workers experiencing lower levels of mental wellbeing. The ready access to alcohol on site means that it is all too often the default choice for dealing with stress, anxiety or other problems. The Committee acknowledges that many sites place limitations on the amount of alcohol that can be purchased by workers, but many submitters raised concerns about the permissive drinking cultures that remained prevalent on a number of sites.
(Ch. 3, p.38)

The Committee is aware that excessive consumption of alcohol away from the mining workplace may be a problem for some FIFO workers, and would appreciate more information on the impact of these habits on the mental health of the worker and their family.

A connected issue relates to the consumption of alcohol by workers during a shift changeover period where they are required to stay on an accommodation site. The Committee is aware that there have been tragic outcomes reportedly arising from binge drinking during this shift changeover period.
(Ch. 3, p.38)

UnionsWA response

As mentioned in our original submission to the inquiry, alcohol and drug abuse should be included in a code of practice for FIFO work to be adopted by WorkSafe. It is an important issue which should be addressed by a comprehensive approach that plays proper attention to causal factors of alcohol and drug abuse such as

- Camp accommodation and services;

- Fatigue management;
- Support for workers who have identified as having a mental health issue; and
- Family support.

The practice of motelling reduces the sense of community in accommodation facilities in the FIFO sector and this loss of community potentially contributes to the feelings of isolation and loneliness experienced by some FIFO workers. A sense of community helps to build resilience amongst workers.
(Ch. 3, p.40)

UnionsWA response

Motelling is a fairly recent development in the local construction and mining industries. While employers may see it is a cost saving, motelling is staunchly opposed by the workforce.

Recently contractors have been offering additional wages to workers to induce acceptance of motelling and double bunking. We believe that this is tantamount to danger money; many workers will feel pressured to accept the change even isn't necessarily in the best interests of their mental health.

The Inquiry should recommend that motelling be replaced by a strategy of building and maintaining a sense of community and cohesiveness in FIFO accommodations.

The Committee queries whether Lifestyle Coordinators are currently meeting the psychosocial needs of the FIFO workforce.
(Ch. 3, p.42)

UnionsWA response

Lifestyle Coordinators, as their roles are currently conceived, need a much expanded conception of their role. They need to concern themselves with mental as well as physical health, and should be appropriately trained and qualified, as well as resourced, for those roles.

The extreme level of control exercised over FIFO workers while they are on site may heighten the risk of mental ill-health amongst the workforce. This level of control varies between camps but seems to have increased over time.
(Ch. 3, p.44)

UnionsWA response

Companies should not use any recommendations from the inquiry as an excuse to simply increase this level of control over FIFO workers lives in order to 'detect' mental health issues before they become troublesome. FIFO workers do not need to be put on a permanent suicide watch, or treated as children. Rather they need a comprehensive and fully resourced strategy to address their mental health needs.

Financial stresses often mean that the only choice for a FIFO worker is to continue in a FIFO role despite possible impacts on their health and wellbeing.
(Ch. 3, p.45)

UnionsWA response

Changing circumstances in the workplace should be treated with a 'no surprises' principle. This means that companies must take seriously their legal and moral obligations to regularly and fully

consult with their FIFO employees about workplace change. This would assist in making sure workers are not caught out by the 'golden handcuffs'.

Research on the mental health of FIFO workers

The Committee intends to further explore the connection between fatigue and mental health and welcomes further engagement from stakeholders on this issue.
(Ch. 3, p.42)

The Committee does not necessarily agree that the same conclusion can be reached based upon the evidence provided to this inquiry. Especially as the comprehensive study recommended by the Commonwealth Committee has yet to be carried out.
(Ch. 4, p.48)

The Committee acknowledges that it is not at present in possession of data relating to claims for workers compensation for mental stress or psychological injury in the workplace. The Committee would welcome further submissions on this issue.
(Ch. 4, p.50)

UnionsWA response

Anecdotal evidence would suggest that the vast majority of stress and mental health issues would not lead to a workers compensation claim, many workers fear for their future employment.

Additionally, current workers compensation law makes it almost impossible for claims to be made for a mental health injury which occurs as a result of the employment relationship. Therefore workers compensation statistics would drastically underestimate the amount of mental health injuries.

WorkCoverWA has recently canvassed in a discussion paper adopting the 'Reasonable Administrative Action' definition in workers compensation law, which would further reduce an employee's ability to claim for mental health issues arising in the course of the employment relationship.

The Committee should recommend that the state government carry out and fully fund the comprehensive study, independent of both industry and unions, recommended by the Commonwealth Committee

Overwhelmingly, the evidence submitted to the inquiry from the resources sector downplayed the impact of FIFO work practices upon individual psychological wellbeing. There was little acknowledgement of contrary information.
(Ch. 4, p.51)

The Committee would be reluctant to give credence to the estimated rates of suicide by FIFO workers based on the publicly reported suicides. As later sections of this report make clear, there remains significant uncertainty about the rate of suicide amongst these workers.
(Ch. 4, p.52)

For the various reasons already discussed in this section, the amount of research regarding the prevalence of mental illness amongst FIFO workers brought to the Committee's attention by submitters was limited. Having said that, with the exception of the Lifeline WA report, the absence of definitive research does not indicate the absence of a problem.

(Ch. 4, p.53)

UnionsWA response

The Committee should disregard the so-called ‘evidence’ provided by companies and industry bodies. They are inevitably partial and cannot be verified given the aforementioned lack of independent research into the FIFO workforce.

It is the Committee’s view that Rio Tinto’s position underplays the impact of the unique aspects of FIFO work practices upon an individual’s mental health. While it could be argued that FIFO is not a direct cause of suicide or mental ill-health, it does not mean it is not a causal factor and that it is not significant.

As the extended discussion in chapter 3 has made clear, there are a number of stressors that directly result from the requirement that FIFO workers be accommodated away from home. It would therefore be naïve in the extreme to argue that there is no connection between the nature of FIFO work arrangements and the mental health of those working under these arrangements.

(Ch. 4, p.57)

The Committee’s view is that without the research, those who employ fly-in, fly-out workers cannot be said to be meaningfully identifying psychological hazards or adequately responding to them. The Committee has no doubt that the policies that employers are instituting are well-intentioned, and that they may even be effective, but without the research outlining the nature of the psychological hazards posed by fly-in, fly-out work, there is no way to be sure of the effectiveness of the industry’s current response to the issue.

In the Committee’s view, research is needed to establish that FIFO work practices are a safe system of work and to identify specific hazards that might impact on the mental health of the workforce as a result.

The resources sector is experienced in identifying hazards, assessing risks and implementing systems of work that enhance worker safety. Identifying mental health and wellbeing hazards should be the same when delivering safe and healthy workplaces.

(Ch. 4, p.58)

UnionsWA response

We agree with the Committee’s comment here. As previously stated, the higher suicide risk profile of FIFO workers is a ‘known known’ and should be treated as such by the industry.

Industry Initiatives

The Committee would be interested to know what proportion of the workforce is able to access these programs, and what proportion actually does use them. The level of engagement amongst the workforce with these sorts of programs would be a very relevant statistic. It is worth drawing a parallel at this point with the physical safety induction/on-boarding programs run by companies that are mandatory. Many, if not all of the programs identified above would be a voluntary initiative. A measure of how many people are actually using each service would assist companies, and the Committee, to understand how much support employees are receiving. In addition, it would be useful to know how many employees are actually aware of the range of services their company provides.

The Committee would also be interested to know how many companies run initiatives such as the

'FIFO Families workshops' and the family visit days. These would appear to be useful initiatives for families, but it is not clear how many people are able to access them.
(Ch. 5, p.62)

The Committee would be interested to know what the access rate of the general workforce is for use of an EAP; what percentage of resource workers uses their company's EAP across each company; and what percentage of FIFO workers accesses the EAP.

This information is of interest because of the nature of the service provided by EAPs. Namely, they provide services to people who already feel like they might be in crisis or experiencing difficulty. They are not, generally speaking, a preventative mechanism that promotes mental health and wellbeing amongst the workforce.
(Ch. 5, p.63)

Without further detail and statistics, the Committee cannot draw a conclusion on this information, other than to state that it believes that the EAPs run by companies may find even greater rates of usage amongst resource workers if greater effort is made to promote these to workers.
(Ch. 5, p.64)

UnionsWA response

It is not enough for companies to simply have a list of programs, and assume that the 'job is done' on FIFO and mental health. Unless there is regular measuring and auditing of these programs, there is no way of knowing whether they are actually addressing the mental health needs of FIFO workers.

The Committee has received no detailed information on the procedures companies have in place for a mental health evacuation, including details of the provision of an escort for someone experiencing a mental health crisis. The Committee would like to receive further information on what is considered to trigger a mental health evacuation, what exactly is involved in such an evacuation, and how far companies feel their duty of care extends to their employee (i.e. as far as Perth airport, or as far as the employee's home).
(Ch. 5, p.66)

UnionsWA response

UnionsWA is concerned that 'mental health evacuation' is just being used as way to 'remove problem workers' by companies. At the moment, if a FIFO worker is no longer on site then the company can wash its hands of responsibility for any mental health issues the worker may have had.

The Committee would be interested to learn of the policies in place for staff when dealing with the immediate aftermath of a suspected suicide, including securing the location, handling the deceased in a respectful manner, informing the family and the workforce of the death and arranging for counselling and other supports.
(Ch. 5, p.67)

UnionsWA response

The Committee should make concrete recommendations on the need for companies and regulators to develop comprehensive policies in regard to a suspected suicide aftermath.

The Committee is aware of the many mental health first aid training programs that are offered by a variety of providers, but it is not known how extensive such training is in the resources sector. The Committee would be interested in further detail about the prevalence, use and effectiveness of such training in the resources sector.

(Ch. 5, p.68)

UnionsWA response

The Committee should recommend that standards and targets be developed and implemented for mental health training in the resources sector, with particular attention to FIFO worker's needs.

Regulation

The Committee notes that there is currently a proposal under consideration to transfer regulatory responsibility for major hazard facilities, such as LNG plants, from WorkSafe to DMP. The current arrangements, particularly with respect to how they relate to construction activities on Barrow Island would seem to be less than ideal, both from the perspective of the workers the regulation is intended to protect, and the employers who must grapple with multiple regulatory jurisdictions on the one site.

In the Committee's view, regulation must be efficient in addition to its fundamental requirement of effectiveness. At the very least it is difficult to see how the current arrangements with respect to Barrow Island could be efficient given the inevitable confusion over which agency has jurisdiction and the likely necessity to duplicate regulatory expertise and effort across more than one agency.
(Ch. 6, p.74)

Given the connection between the employment and the employee's presence in the accommodation facility, the arbitrary distinction between the workplace and non-workplace settings in the MSI Act appears not to have regard for the unique nature of FIFO work arrangements.

Unfortunately, the Department of Mines and Petroleum did not provide further elaboration about how it had come to develop its understanding of the intent of the legislation. The Committee notes that "catering, residential, or recreational facilities for employees or self-employed persons" are specifically excluded from the definition of workplace in the MSI Act, although exceptions are made for those who are employed to service or maintain those facilities. DMP's interpretation of the intent of the provisions is therefore consistent with the definition of workplace established in the legislation. The Committee notes, however, that the objects of the MSI Act, at section 3(1)(a), make no reference to limiting the promotion and securing of safety and health to those in the workplace, and extends the objective of the Act to those engaged in mining operations, which specifically includes residential and recreational facilities.

(Ch. 6, p.77)

UnionsWA response

DMP is not an adequately resourced to investigate mental health issues. Additional resources should be allocated to safety agencies and specialised mental health staff should be employed in these agencies.

The purpose of section 15D is somewhat lost on the Committee, as it seems unlikely that many residential facilities would fall within the definition provided, particularly given that it excludes any accommodation provided on a mining tenement itself. The existence of section 15D also gives rise to questions as to differing obligations attaching to the operators of accommodation depending upon the type of facility they operate (i.e. under section 4 or under section 15D).

(Ch. 6, p.78)

It would appear that there is an inconsistency in the level of regulatory protection provided to workers depending upon their employment in the mining industry or the petroleum industry. It is

not clear why such an inconsistency should exist, or what it means for the effective protection of the occupational safety and health of the mining workforce in comparison to their colleagues in the petroleum industry.

(Ch. 6, p.78)

UnionsWA response

The Committee should recommend a substantial overhaul of legislation relating to the accommodation of FIFO workers. Given that having a roof over one's head is such a basic requirement, it is absurd that laws relating to the obligation of operators are such a dog's breakfast.

The problem with reliance upon the common law duty of care in situations such as this is that it is an entirely reactive approach, relying upon an injury to occur to a person before an attempt can be made to recover damages. Regulation is obviously the more attractive protection for workers because it is, by its very nature, proactive and seeks to prevent the occurrence of injury.

(Ch. 6, p.79)

UnionsWA response

The Committee should recommend that a proactive duty of care with the force of regulation be drawn up in consultation with the FIFO workforce.

The Committee will consider whether motelling would be a feature of modern FIFO work practices if employers were required by law or regulation to give regard to psychological and mental health factors when designing the operation of the accommodation facilities.

(Ch. 6, p.80)

UnionsWA response

As UnionsWA stated in response to a previous Committee comment on motelling, this Inquiry should recommend that motelling be replaced by a strategy of building and maintaining a sense of community and cohesiveness in FIFO accommodations.

The Coroner's Office advised the Committee that all coronial investigations are thorough, and that if there was evidence of bullying associated with a suspected suicide, that evidence would be reported. The Committee does not know if DMP is provided with copies of coronial reports once they have been completed in order for DMP to ascertain whether workplace factors were identified by the Coroner as contributing to the suicide. This is an issue on which the Committee would welcome further input.

(Ch. 6, p.83)

UnionsWA response

This situation is yet another demonstration of that safety regulators are currently under resourced and are not treating mental issues as a priority.

It is noteworthy that the only reports of suspected suicides in DMP's records correspond to the period when discussions about this inquiry began appearing in the media. Clearly, the publicity surrounding this inquiry has prompted mine site managers to begin reporting suspected suicides in accommodation facilities. This is, of course, a good thing but a number of issues are raised.

...

It is also important to keep in mind that not all workers who commit suicide as a result of FIFO-related distress will do so on site. If a worker were to commit suicide at home, it would be reported to the Police and the Coroner for investigation. It is unclear whether the possible role of FIFO in that

suicide would be a feature of the investigation.

It is therefore possible that a degree of under-reporting of suicides in connection with FIFO will be unavoidable.

(Ch. 6, p.85)

UnionsWA response

UnionsWA acknowledges that suicide is a complex issue, and appreciates the Committee's concern that there will always be uncertainties and likely under-reporting of suicides in relation to FIFO. In our view this puts the onus on the industry to take the initiative in addressing this issue comprehensively, without relying on a narrow reading of the numbers of reported incidents to use as an excuse to avoid acting.

The Committee has also asked for additional comments on return to work and workers compensation issues associated with the FIFO workforce.

Currently the definition of an injury under workers compensation in WA excludes many mental health injuries if they arise in the course of the employment relationship. While a claim relating to bullying may be more cut-and-dried to finalise, a claim relating to relationship breakdowns due to rosters or fatigue generally will not be accepted.

Additionally, when the mental illnesses manifests in the home environment under current legislation it is almost impossible to determine how it relates to work practices.

The Committee has a unique opportunity to work with WorkCoverWA on this issue as they are currently drafting a new workers compensation act. UnionsWA recommends that the Committee consider recommending that WorkCoverWA:

- Address mental illness and psychological injury separately to the broader definition of disease and to include provisions around remote work and the risks which contribute to mental illness; and
- Ensure that compensation can be accessed in the event of suicides in the home environment when a worker is on an off swing.

Additionally we have concerns in the drafting of the new legislation which expanded provisions which deal with 'reasonable administrative action'. The final report on the new statute released by WorkCover stated:

'It is recommended the definition of 'injury' exclude psychological injuries (diseases) arising from 'reasonable administrative action' taken by an employer in respect of a worker's employment.'

If adopted this provision will make it near impossible to claim compensation if the mental health issue is developed from 'administrative action' taken by the employer. The definition of administrative action covers the administration of the day-to-day activities relating to the employment of an employee.

It is quite likely that this recommendation will unjustly remove workers compensation claims for mental illnesses of FIFO workers from the system all together.

Once again UnionsWA thanks the Standing Committee for the opportunity to comment on this Discussion Paper

I would be happy to discuss our submission with you in more detail. Please don't hesitate to make contact on either 9328 7877 or mhammat@unionswa.com.au to arrange a suitable time.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Meredith Hammat', written in a cursive style.

Meredith Hammat
Secretary