



Beyond Blue submission into the Safe Work Australia review of the model Work, Health and Safety (WHS) laws

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Executive Summary

Effective workplace health and safety laws and supporting instruction and guidance are an important foundation for mentally healthy workplaces. The Model Work Health and Safety Laws (Model Laws) rightly recognise that for healthy workplaces to exist, employers have a responsibility to protect physical and psychological injuries equally.

The 2018 Review of the Model Work Health and Safety Laws (the Review) was commissioned by Safe Work Australia. The Review team consulted with industry and sector stakeholders and called for public submissions. The Review concluded there is need for greater clarity around the responsibilities of Persons Conducting a Business or Undertaking (PCBU) in relation to psychological health and safety.

For the past 15 years, Beyond Blue has identified workplaces as an ideal setting to improve the mental health of people in Australia. Work can have a significant impact on health and wellbeing – positive or negative. We welcome the opportunity to provide a response to Safe Work Australia's Regulation Impact Statement consultation process. This response primarily deals with Recommendation 2: Make regulations dealing with psychological health:

Amend the model WHS Regulations to deal with how to identify the psychosocial risks associated with psychological injury and the appropriate control measures to manage those risks.

Nobody should be injured at work, either physically or psychologically. As the World Health Organization says, there is no health without mental health¹. However, the Review demonstrates there is a perception that workplace psychological health and safety is confusing and often deprioritised compared to workplace physical health and safety. Beyond Blue believes these findings create a strong case for strengthening the regulatory framework in relation to psychological health.

Beyond Blue's position is underpinned by:

- **Equity:** First and foremost, action is overdue to bring psychological health and safety in the workplace into line with physical health and safety, for the benefit of both PCBUs and workers.
- **Business benefits:** The most effective control measures for psychosocial risk in the workplace have clear benefits for workplaces, not just by reducing the incidence of injury, but by actively supporting productivity, participation and a positive workplace culture.

However, as we are not regulatory or legal experts, Beyond Blue does not make a recommendation about the best form of regulation to achieve this. For the purpose of this submission, we use the term "regulation" to denote any possible mechanism for effecting workplace behaviour change, across the three tiers outlined in the review: the model WHS Act, model WHS Regulations and model Codes.

The key finding of the Review with respect to this recommendation was the need for greater clarity for PCBUs who are uncertain about how to address psychological health and safety in the workplace. Most participants in the Review favoured specific action to address psychosocial risk in the workplace. The Review concluded that the Model Laws as they stand do not provide enough explicit instruction to PCBUs about how to identify psychosocial risks in the workplace and how to apply the appropriate control measures to manage those risks. This reflects the feedback the Beyond Blue Workplace Program hears from employers and managers every day who either struggle to, or are reticent to, identify and acknowledge psychosocial risks.

As important as the need for an equitable regulatory framework is, the need is greater for that framework to be carefully designed and to be accompanied by sufficiently resourced implementation and compliance support. Consequently, poor design or implementation which is too onerous on employers, especially small business, may include avoidance, stymied innovation and efforts to move beyond minimum compliance, and/or even worse employment outcomes for Australians affected by poor mental health.

Conversely, strengthening the regulatory framework would, if designed effectively with sufficient change management and implementation support:

- provide the greater clarity employers are seeking;
- support PCBU's to identify psychosocial risks and apply appropriate control measures, as the foundation of creating mentally healthy workplaces;
- bring psychological health and safety in line with the longstanding regulatory approach to physical health and safety;
- provide greater strength for regulators to both support good practice and act on poor practice in relation to psychosocial issues; and
- serve to make the National Workplace Initiative (NWI), announced in the 2019 federal Budget, stronger.

Beyond Blue believes it is important to recognise that stronger regulation is only one enabler to creating workplaces with mentally healthy cultures. Regulation alone cannot protect against insufficient leadership on psychological safety in the workplace, discriminatory cultures or poor workplace practices. We need strategies to address all these barriers to good practice and employment outcomes. A clearer regulatory framework will, however, provide a foundation on which workplaces can be supported to enact broader change to improve workplace mental health.

In this context, the response to the Review should not be seen in isolation. It should consider, complement and integrate with the NWI, funded by the Commonwealth Government in the 2019 Budget and coordinated by the National Mental Health Commission on behalf of the Mentally Healthy Workplace Allianceⁱⁱ. The NWI will complement the work of State and Territory regulatory bodies and link employers and employees to them, but will provide a broader range of information, resources and tools to support businesses of any size to build and maintain mentally healthy workplaces.

Recommendations:

- 1. Psychological health and safety regulation (of any form) is clarified and strengthened to ensure equity with physical health and safety.**
- 2. Any revised or new regulation is introduced in a phased approach with adequate implementation support, allowing workplaces of all sizes the opportunity to effectively implement change.**
- 3. Design of the regulation is integrated with the NWI to ensure a mutually reinforcing relationship.**

The importance of psychological health

Beyond Blue's vision is for all people in Australia to achieve their best possible mental health. Intervening in the big settings where people live their lives – such as the workplace – creates scope for population-wide, systematic, transformational and cost-effective change.

The workplace is an effective setting for preventing harm, protecting mental health and supporting people with mental health conditions in their recovery. There are many levers available to achieve change in workplace mental health, with legislation and regulation to improve protection against psychological injury being one.

Safeguarding psychological health and mental wellbeing at work has a major impact on those in work, and by supporting mentally healthy workplaces, can have a strong impact on society and the economy.

Almost one-quarter of the Australian workforce experience mild symptoms of depression that lead to absenteeism of 50 hours per person per year. A further eight per cent experience moderate to severe symptoms of depression that lead to absenteeism of up to 138 hours per person per yearⁱⁱⁱ. More than half (51 per cent) of respondents to a 2015 survey reported having left a job at least once 'because it was a poor environment in terms of mental health and wellbeing.'^{iv}

Improving mental health lifts business productivity by improving human capital – helping people perform at their best. One estimate indicates that each year in Australia, \$12.8 billion is foregone from lost productivity and job turnover due to mental health conditions. KPMG (2018) estimate that implementing a

select group of evidence-based workplace interventions could save \$4.5 billion a year.^v PwC research commissioned by Beyond Blue (2013) estimate an average ROI of 2.3:1 for workplace mental health interventions. This is supported by international evidence that suggests an average ROI of 4.2:1.^{vi}

In addition, a more mentally healthy working population will mean lower outlays on addressing mental health conditions and their consequences. Australia is spending around \$29 billion a year – excluding capital spending – directly addressing mental health issues.^{vii}

An integrated approach to workplace mental health

Beyond Blue believes that mentally healthy workplaces prevent harm to their employees, promote the positive aspects of work, protect the wellbeing of their staff, and support staff with a mental health condition. This is captured in the Integrated Approach to Workplace Mental Health model (La Montagne, et al., presented in Figure 1).¹

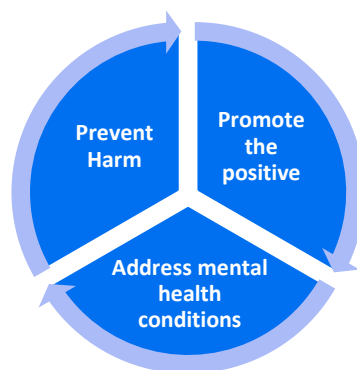


Figure 1: La Montagne et al (2014) integrated approach to workplace mental health.^{viii}

Mentally healthy workplaces, regardless of size or industry, have a few things in common:

- **Positive workplace culture:** they are places where people feel good about coming to work, and everyone is encouraged and supported.
- **Risks to mental health are managed:** the elimination and minimisation of psychological risks, such as excessive work-hours, poor job design, persistently high workloads, emotional effort in responding to distressing situations or distressed or aggravated clients, bullying and harassment. These and other factors can all contribute to creating or worsening mental health conditions.²
- **People living with mental health conditions are supported:** helping people to enter the workforce, stay at, or return to work, has clear benefits for the individual, their family and community, and their employer.
- **Zero-tolerance approach to discrimination:** in addition to being a legal requirement, protecting current employees and potential employees (in hiring practices) from discrimination encourages a diverse and fair culture.

Safe Work Australia outlines a tripartite model in its national guidance material on psychological health and safety: preventing harm, intervening early and supporting recovery. As shown in Figure 2, this model differs slightly to the integrated model by La Montagne et al outlined above.

Legislation and regulation such as the Model Laws provide the legal minima required to prevent harm and address mental health conditions in workplaces. They provide some guidance but do not prescribe the circumstances that might facilitate workplaces to become mentally healthy. This may involve action on workplace culture, job design or effective leadership practice. As noted in the national guidance:

¹ Note – this model remains untested in small businesses, particularly sole traders, who may have less capacity to control their job design.

² Further examples of psychological risks are provided in Safe Work Australia (2018) work-related psychological health and safety guide.

You are not required to implement workplace health promotion and wellness programs under either WHS or workers' compensation laws. However, implementing appropriate well run programs is considered best practice. (p.6)

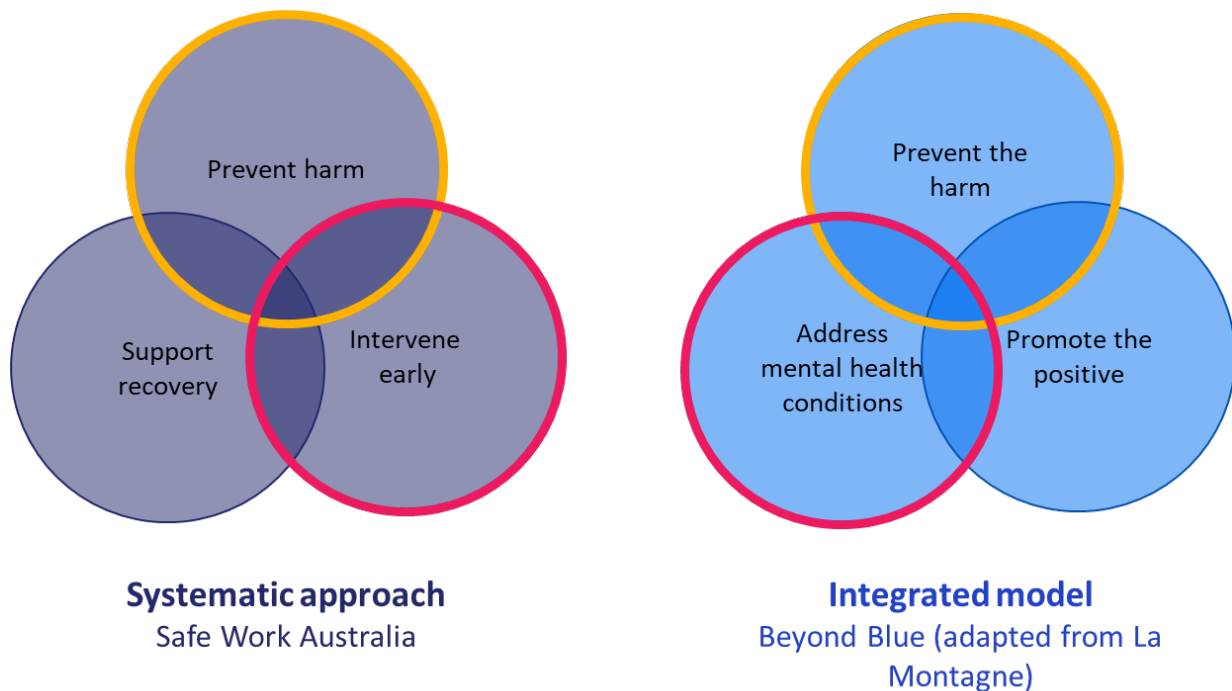


Figure 2: Comparison of the systematic approach and the integrated model

The Model Laws have the power to be the foundation of an integrated approach in workplaces. As a result, it is important that they are as useful as they can practicably be within the domains with which they are primarily concerned – preventing workplace harm and addressing mental health problems as early and effectively as possible.

Findings of the Review

The Review identified that there is scope for greater clarity around psychological health and safety in the Model Laws, particularly in regulation. We agree. The Beyond Blue Workplace Engagement team has regular contact with many workplaces and workplace intermediaries (such as peak bodies and employer groups). Consistent feedback we receive is that the current regulatory environment is hard to understand and navigate.

This is particularly the case for small businesses who are less able to dedicate specific resourcing to ensure they are meeting their legal and regulatory requirements. Small business owners need simple, easy-to-understand guidance on how to interpret and implement their obligations.

The status quo response outlines that psychological health and safety is a component of overall work health and safety. However, it does not sufficiently explain what that looks like for workplaces. This has two practical consequences.

Workplaces, particularly small businesses, are resource-constrained so naturally tend to focus on the most 'visible' components of workplace health and safety, such as physical health needs. As a result, **psychological health and safety is deprioritised**. PCBU's find it more straightforward to implement risk elimination and mitigation measures in relation to physical safety, where risk elimination and mitigation practices are more established and a more widely understood hierarchy of controls exists (discussed further below).

Additionally, feedback to Beyond Blue also indicates that many duty holders:

- still fail to recognise that psychological injury can arise from work-related activity, and perceive that it is an individual's matter to address;

- are reluctant to start the process to identify workplace psychosocial hazards and risks, for fear of how workers will respond and for fear of the actions required to address these risks; and/or
- consider psychological health and safety as a ‘nice to have’.

As the Review highlights, even where psychological health and safety is an organisational priority, **PCBUs lack clarity and direction** about how to identify work-related psychosocial hazards, assess risks and subsequently implement risk elimination and mitigation approaches. One of the consequences is that workplaces either do very little in relation to psychological health and safety or focus on hazards they are familiar with, such as those related to bullying and harassment. This means that workplaces miss the opportunity to undertake a more holistic approach to risk control, such as addressing ways to positively improve employee wellbeing, not just removing risks to bullying. Beyond Blue believes that the best outcomes for all occur when workplaces consider strategies to support not just the one in five workers affected each year by poor mental health, but the five in five.

We acknowledge the considerable effort by Safe Work Australia and state and territory-based regulators to improve awareness of psychological health and safety and provide education on practical implementation. Most recently these efforts include:

- Safe Work Australia’s *Work-related psychological health and safety. A systematic approach to meeting your duties. National guidance material.* (Updated January 2019)
- The Victorian *WorkWell* program, including online toolkit, grants program and learning networks
- Queensland’s *Mental Health at Work Action Plan 2016-20*, *Mentally healthy workplaces* website and the *Mentally Healthy Workplaces Toolkit*
- NSW’s *Mentally Healthy Workplaces Strategy 2018-22*, including collaboration between iCare, SafeWork NSW and SIRA.

Beyond Blue commends each of these agencies for their commitment to implementing guidance and support materials and programs for workplaces. The national guide produced by Safe Work Australia has been particularly well received among stakeholders. However, as vitally important as education and awareness-raising are, they are insufficient by themselves. Participation in good practice, evidence-based programs may be limited only to proactive employers.

As history shows – especially with more complex policy issues that have a profound impact on health, society and the economy such as road safety and tobacco control – regulation is a key foundation for action and change alongside a number of other interventions.

In the workplace setting, regulation has a long history of being a fundamental driver of activity. Addressing the current situation, where regulation is seen as a major component to drive safe practice in physical health but not for psychological health and safety and regulation, would provide explicit direction of the risk management approach appropriate to be undertaken by duty holders to prevent work-related psychological injury.

While Beyond Blue has the aspiration for the creation of mentally healthy workplaces in line with the integrated approach described above, we recognise that many duty holders wish to meet minimum legal requirements as a starting point. Our Heads Up website data suggests this is the case among our stakeholders as we see significant website traffic on the [‘legal rights and responsibility’](#) page as compared to other parts of the website.

Our position reflects that the need for greater clarity in regulation to ensure psychological safety becomes and remains a priority for PCBUs as it is with physical safety, and they are supported and empowered to take steps to address it.

Guidance material, whilst beneficial, does not have the gravitas required to address the challenges and lost social and economic benefits with the status quo. That said, guidance material is vital alongside regulatory change to provide ongoing education and complementary practical guidance for implementation (see section below ‘Building on the Model Laws’).

Design and implementation

While Beyond Blue favours the implementation of regulation around psychological risk in the Model Laws, we recommend the following essential considerations for the design and implementation of this recommendation.

Nature of the regulation

The primary objective of any change to regulation should be to set minimum expectations for duty holders and greater accountability for regulators in relation to psychological health.

Any regulation included by Safe Work Australia must be developed based on key principles:

- **Clarity:** any changes to regulation should provide greater clarity to PCBU's. As a result, it is vital that the regulation is clear, provides direction and is easy to understand.
- **Specificity:** some specificity in regulation will be necessary to support PCBU's to understand their psychological health and safety obligations. This will help to overcome some of the challenges identified in the Review, such as workplaces' focus on the most 'visible' elements of psychosocial risk, e.g. bullying.
- **Proportionate:** while we strongly believe that all PCBU's should meet their legal and regulatory obligations under the Model Laws, it must be acknowledged that workplaces have varying capacity to implement changes (see below). Regulation should give sufficient flexibility as to be proportionate to the capacity of workplaces to implement regulation most effectively for their size and context. Consideration of unintended consequences (e.g. avoidance, the stymying of innovation and efforts to move beyond minimum compliance, and/or even worse employment outcomes for Australians affected by poor mental health) in the design and implementation of changes must be paramount.
- **Supported:** any change to the regulatory environment must be supported by ongoing and sufficiently resourced education, assistance and advice about how to apply these laws.
- **Consistent:** changes to regulation must support consistency across the Model Laws to support implementation by PCBU's.

A significant challenge for the implementation of regulation is that the evidence relating to workplace mental health, and how best to support it, is emerging. That said, there can and must be a level of specificity to address the challenge raised by PCBU's around how best to meet their obligations, as exists for physical risk. This suggests that the guidance material and implementation support that accompanies regulation is as important as the regulation itself (see below 'Building on the Model Laws').

The content provided in the national guidance material is a good start for regulation, as it has been developed in consultation with workplaces and already socialised among workplaces to a certain extent.

Clarity in regulation will also provide greater support to regulators and inspectors, who also must be sufficiently trained, resourced and supported through this transition period to ensure they are able to provide the best guidance to workplaces. Inspectors currently have a highly generalist skillset, often established from a career working in physical health and safety. There are many benefits to having an inspectorate with a general skillset, but it must be acknowledged that psychosocial risk and psychological injury are also challenges for implementation by regulators as they are for PCBU's. This is particularly important given that psychological health and safety requirements are applicable to all workplaces.

Hierarchy of controls

The Review highlighted some concerns around the appropriateness of a hierarchy of controls model for psychological health and safety. There are some challenges in implementing a hierarchy of controls model for psychosocial risk, particularly as the solutions are highly context-specific and psychological stresses are not always able to be managed in a linear way.

However, the hierarchy of controls can be flexibly adapted for psychosocial risk, as outlined in the Safe Work Australia work-related psychological health and safety guide on pages 19-21.^{ix}

The hierarchy of controls for psychosocial risk must be adequately explained to businesses. Many workplaces are still in a state of relative immaturity in relation to psychological health and safety, which means that the possible control measures may be less apparent.

Every other hazard that is currently regulated has clear guidance and references the hierarchy of control (model WHS Act regulation 36³) to assist employers to determine the most effective way/s to manage it. The benefit of this is that workplaces can understand, firstly, what they need to do, and secondly, the relative ease of being able to make those changes to ensure compliance.

Some suggest that psychological injuries differ from physical injuries in that the cause is often multifactorial. We would argue that, while this may be the case, it does not necessarily differ from that of many physical injuries. For example, musculoskeletal problems may not be caused solely by manual handling on the job, but that manual handling may exacerbate an injury sustained outside of work. More importantly, workplaces have an obligation to support all workers to participate safely in work without doing additional harm.

Psychological injury is no different. Psychosocial regulations could focus on PCBU's having regard for all relevant matters that may contribute to a psychological injury. Such matters, which are discussed internationally, are universal workplace hazard considerations. Examples of these are outlined in the Guide [pgs. 9-11]) and include job demands, job control, support, workplace relationships, role design and clarity, organisational change management and environmental conditions. The hierarchy of controls can be adapted to address these. Mitigation strategies are able to be introduced and combined with protective factors. For example, if a role requires frequent exposure to distressed customers resulting in increased likelihood of vicarious trauma, job rotation can be introduced to reduce this exposure or specialist supervision can be sought to manage the impact.

The key is for workplaces to focus on the risk factor – not the individual – when addressing psychological safety, just as they do with physical risk.

Supporting small business

The Model Laws are applicable to all workplaces. But we are only able to get the most out of regulation if it is implemented in a way that supports all workplaces to attain compliance. Any changes to the regulatory framework must ensure careful attention to the impact of those changes, including monitoring for unintended consequences, and ensuring that the changes do not create unnecessary regulatory burden on small business.

“The way regulations are implemented is as important to small business and to compliance outcomes as the content of the regulations themselves.” – Productivity Commission^x

Over 95 per cent of Australia's businesses are 'small'.^{xi} Small businesses often need help to translate regulation into their context. As noted in the Review, “many small and medium-sized businesses fear engaging with the regulator and are reluctant to seek advice from inspectors” (p. 87). A particular concern about the Model Laws is that they were developed with larger businesses in mind. It is important that any changes to regulation reflect this ongoing concern among smaller businesses and are implemented in a way that support all workplaces to meet their obligations, rather than cementing fear of regulation.

Small business owners already face a series of unique business pressures, including financial pressures, isolation and management of work/life balance.^{xii} The Productivity Commission has found that small business owners spend proportionally more of their time and resources on regulatory compliance than their larger counterparts.^{xiii} That said, for many small business owners, clarity within regulation will help to address a consistent finding in the Review that PCBU's would like more instructive regulation in relation to psychosocial risk.

³ It is noted that Recommendation 27 recommends that regulation 36 be moved to the model WHS Act. The above content regarding clarity of relevance of the hierarchy to psychosocial hazards and risks stands even if this occurs.

Effective communication can also help to demonstrate that many of the most effective control measures are not merely a regulatory burden or more 'red tape'. Controlling psychosocial risk has clear benefits for workplaces, not just by reducing the incidence of injury, but by actively supporting productivity, participation and a positive workplace culture.

The Review also highlights a number of workplace contexts that face particular psychosocial risks, including geographically isolated workers, fly-in fly-out workers, migrant workers, home-based workers, and women returning from maternity leave (p.32). It may be that these workplaces need additional support and focus during the transition period to ensure they are not unduly penalised with the prompt introduction of regulatory change.

The purpose of any regulatory changes should be to help provide clarity about managing psychological health and safety and should include a transitional period, for example, with immunity from any applicable penalties or sanctions. This must be clearly articulated to workplaces to ensure they adequately use the transition period to implement measures to create a psychologically safe environment in line with their regulatory requirements.

Building on the Model Laws

The overall goal of regulation is to ensure that workplaces are safe environments. While regulation is essential to reducing the key risks associated with workplace occupational health, regulation alone is not sufficient to achieve best-practice supportive environments:

“compliance with certain legal standards is often not an endpoint but a waypoint – albeit a most import one – to improved regulatee behaviour.”^{xiv}

The purpose of any regulatory framework is to promote continuous improvement among workplaces. This occurs through two types of activities: *compliance* regulation to attain 'minimum standards'; and, *aspirational* best practice to encourage workplaces to improve their behaviour even further (see Figure 3).

As it currently stands, PCBU's face several challenges in attaining an aspirational standard. Firstly, the Model Law status quo makes it challenging for workplaces to meet their compliance regulatory needs. But secondly, there is inconsistent guidance around how to attain an aspirational standard.

Beyond Blue, as a member of the Mentally Healthy Workplace Alliance (the Alliance), has advocated for a national approach to workplace mental health to bridge this gap between compliance and best practice. The Alliance has promoted a National Workplace Initiative (the NWI) as a best practice guide to employers in how to create mentally health workplaces. Sitting outside the regulatory environment, the NWI would support the Model Laws by modelling best practice and providing tools for continuous improvement.

The NWI would not replace the Model Laws but enhance the ability of PCBU's to meet their minimum requirements and go further to achieve the goal underpinning the legislation: to create healthy and safe workplaces.

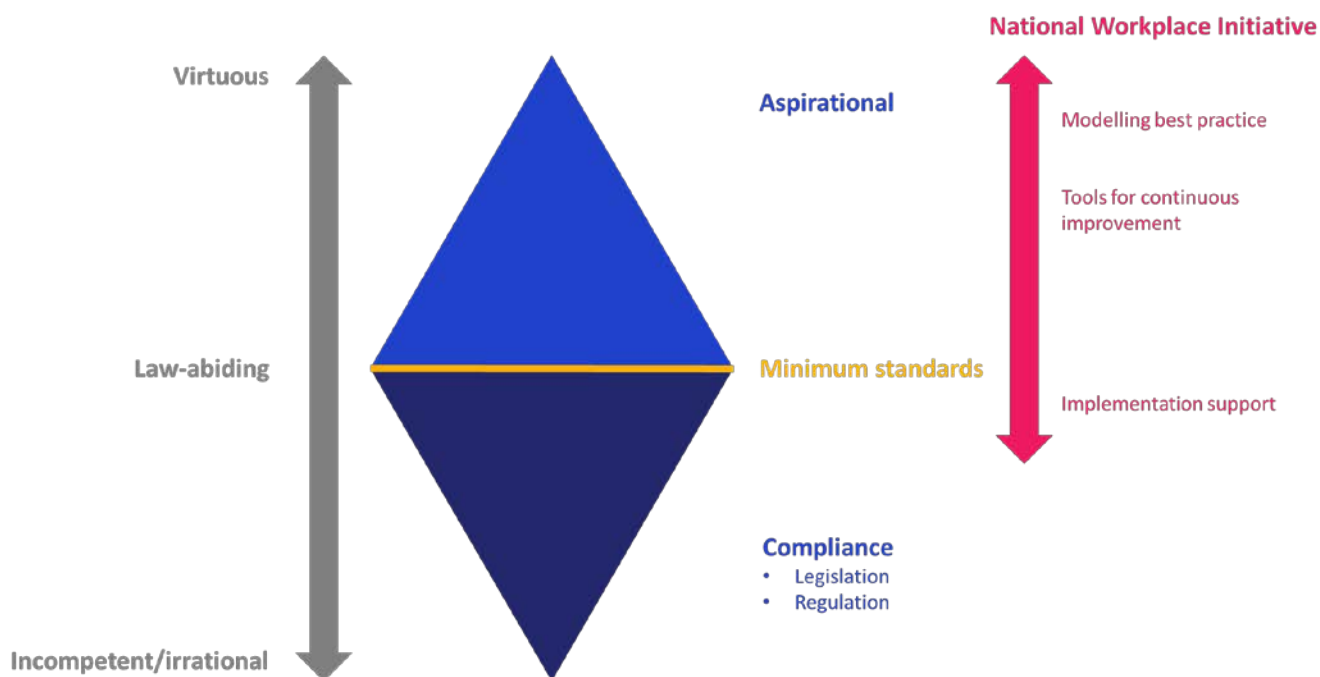


Figure 3: National Workplace Initiative mapped to Kolieb's 'Regulatory diamond'^{xv}

How might regulation and the new National Workplace Initiative be complementary and mutually reinforcing?

A nationally consistent approach is needed to support workplaces – micro-small, medium to multinational – to capitalise on these efforts to promote good mental health: collaboration by governments, regulators, business, unions and the mental health sector will provide consistent, simple, trusted, practical advice and implementation support to every Australian workplace. The essential components of such a national initiative would include:

1. **A definitive online resource for workplace mental health, detailing 'what works' and clear, step-by-step processes for taking action.** All employers will be able to voluntarily choose a level of commitment that reflects their maturity and aspirations from 'meets legal obligations' to 'meets best practice', which may be attractive for employers looking to reap the full benefits of a thriving workforce and becoming employers of choice.
2. **Simple, practical implementation guidance material,** including a suite of online tools and guides to assist workplaces in converting their mental health strategies into action.
3. **Implementation support.** Implementation experts to help workplaces navigate, develop, implement and measure workplace mental health strategies, and to identify workplace mental health champions who will showcase their positive experiences to encourage adoption across the economy.

Beyond Blue has welcomed the 2019 Federal Budget commitment of \$11.5 million over four years for the NWI.^{xvi} The funding covers the first two components above.

Coordinated by the National Mental Health Commission on behalf of the Alliance, it is envisaged that the NWI will complement national, state and territory laws and the work of regulators to support workplaces to best meet their legal obligations and also provide support for workplaces with broader aspirations to derive the full benefits of achieving a mentally healthy environment. Therefore, the NWI offers a unique opportunity for any new regulation to be designed to ensure they are mutually reinforcing.

This can be achieved through genuine, inclusive, extensive and balanced co-design by all relevant stakeholders, including people with a lived experience of mental health issues. Experience from implementing national guidelines in Canada shows the importance of taking time to develop relationships with all stakeholders from the outset. This will ensure that the outcome is meaningful, effective and useful, and gains buy-in from stakeholders when it comes to implementation.

Regulation would cover the identification of psychosocial risk, and appropriate control measures. However, best practice is more than this. As with the clarity challenge around meeting legal obligations, we know that workplaces struggle to understand how to implement best practice in their context. What is needed is not more content, but a navigable means for workplaces to access that content. The NWI would provide that, while incorporating state-based legislation and guidance as it supports workplaces in that goal.

It is important that the approach builds on what is already known in the sector and the extensive good work that has already been done and provides a path into support and guidance for workplaces, regardless of their mental health maturity.

Providing tools for continuous improvement

The knowledge base on workplace mental health is not static. It is a relatively new domain of work health, safety and wellbeing activity. For businesses to continuously improve, they need access to emerging evidence and material that helps translate that evidence into practice. The NWI should be future-focused, helping workplaces along the spectrum of maturity from minimum legal compliance, to challenging them to achieve better environments for their workforce. Clearer guidance and specificity on legal requirements through strengthened regulation will provide a foundation on which workplaces can be supported to enact broader change to improve workplace mental health.

About Beyond Blue

Beyond Blue is a national, independent and bipartisan not-for-profit organisation. Our vision is for all people in Australia to achieve their best possible mental health. We work to create change to protect everyone's mental health and improve the lives of individuals, families and communities affected by depression, anxiety and suicide.

Mentally healthy environments are key to people maintaining good mental health and supporting recovery. Beyond Blue's Workplace program commenced in 2004 and improving workplace mental health remains central to our current strategic goals and objectives. Beyond Blue has had a workplace mental health training program since 2004; we fund workplace-specific research; promote the value of mentally healthy workplaces and are a connector in the workplace mental health sector.

Our work has enabled us to develop strong relationships with key stakeholders, including workplace intermediaries, government and regulators, to understand the evolving national and state landscapes. We are an active member of the Mentally Healthy Workplace Alliance; consisting of national organisations from the business, union, community and government sectors leading change to create and promote mentally healthy workplaces. The Alliance's vision is that all Australian workplaces take active steps to create mentally healthy workplaces, so that all people in the workplace, including those who experience mental health difficulties, their families and those who assist them, are supported.

As an Alliance member, Beyond Blue advocated for the NWI to provide consistent and useful advice and implementation support for all Australian workplaces, with online tools, resources and implementation support to aid workplaces in meeting their WHS legislative requirements and to develop and implement a mental health strategy. In April 2019, we welcomed the Federal Budget announcement of \$11.5 million dollars for the National Mental Health Commission to implement the NWI.

Glossary

Term	Meaning
Alliance	Mentally Health Workplace Alliance
NWI	National Workplace (Mental Health) Initiative
Model Laws	Model Work Health and Safety Laws
PCBU	Person conducting a business or undertaking
Regulation	Any mechanism for effecting workplace behaviour change, across the three tiers outlined in the review: the model WHS Act, model WHS Regulations and model Codes
Review	Review of the Model Work Health and Safety Laws

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