

11 September 2023

Director, Psychosocial and Consultation Policy  
Safe Work Australia  
2 Phillip Law Street  
Canberra ACT 2601

via email: [INConsult@swa.gov.au](mailto:INConsult@swa.gov.au)

## ARA SUBMISSION ON OPTIONS TO IMPROVE WHS INCIDENT NOTIFICATION

On behalf of the Australian Retailers Association (ARA), we acknowledge Safe Work Australia's continued commitment to workplace health and safety (WHS) as demonstrated through the consultation on options to improve incident notification.

The ARA is Australia's oldest, largest and most diverse retail body, representing a \$420 billion sector that employs 1.4 million Australians – making retail the largest private sector employer in the country. As Australia's peak retail body, the ARA informs, advocates, educates, protects and unifies our independent, national and international retail members.

The ARA is proud to represent the rich diversity of Australian retail, from our largest national and international retailers to our small and medium members, who make up more than 95% of our membership. Our members operate more than 120,000 shopfronts and on-line stores across the country, and across all retail categories - from food to fashion, hairdressing to hardware, and everything in between.

We acknowledge the range of sensitive issues covered by the consultation including 'work-related fatalities, suicide and attempted suicide, workplace violence, sexual assault, exposure to trauma, and bullying and harassment'.

These are important issues for our sector and we welcome the intent to increase transparency around the frequency and impact of these types of incidents. However, we make the following observations in comparison to a physical injury or harm, which would arguably have fewer issues in terms of reporting.

- The location where an injury or harm takes place may be different to where the impact is felt. For example, an incident that takes place in the home could manifest as a workplace incident, and vice versa.
- There is still a stigma associated with some of the harms listed in the consultation, which may discourage reporting by individuals even if additional privacy measures were put in place.
- There would be a need to build awareness about how to manage these types of incidents because poor handling could do more harm than good, particularly where there is no physical indication of harm.

We acknowledge the difficulty in consulting around these issues, let alone designing policy interventions.

We also acknowledge the challenge in crafting a consultation paper that caters to a wide array of sectors. The retail sector is experiencing dynamic and ongoing shifts - driven by technological advancements, shifting consumer behaviours and new operational challenges - that are reshaping the work environment in our sector. As the retail landscape continues to evolve, so do the nature and scope of challenges our employees face. Given this context, we need to be mindful of the future operating environment.

We welcome any feedback in respect of this submission and look forward to supporting the development of an appropriate WHS incident notification process, that is fit-for-purpose for the retail sector.

Any queries in relation to this submission can be directed to our policy team at [policy@retail.org.au](mailto:policy@retail.org.au).