Consultation Paper – WHS Incident Notification

Submission to Safe Work Australia

SEPTEMBER 2023

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Ai Group has been involved in a range of discussions as a Member of Safe Work Australia in relation to the possible ways that the requirements for notification may be amended. We acknowledge that the consultation paper is the culmination of these discussions, and that it reflects a range of options that were canvassed during those discussions.

We welcome the opportunity to provide a formal response to the proposals that have been considered.

However, we also wish to express our concern about the work being progressed without an impact analysis being completed. We acknowledge that rules surrounding the impact analysis process were amended in June 2023 - Home | The Office of Impact Analysis (pmc.gov.au). It is now stated that:

> *Impact Analysis will no longer be mandatorily finalised with the Office of Impact Analysis, unless it is requested by the relevant decision maker(s).*

It is Ai Group's view that any increases to the incident notification requirements will result in a regulatory burden for persons conducting a business or undertaking (PCBU) and increased costs for commonwealth/state/territory WHS regulators. An impact analysis could make an assessment of whether the benefits of increased notification/reporting requirements are significant enough to justify the costs and also consider how the risks associated with the notification of bullying and harassment (outlined later in this submission) could be reduced.

General comments on the review and its context

Section 3.3 of the consultation paper identifies that incident notification is "primarily designed to alert the WHS regulators to the most serious workplace incidents and potential breach of duties".

Historically, PCBUs have recognised these notification obligations as relating to traumatic injuries or dangerous occurrences that may have resulted in traumatic injuries. In organisations that understand these obligations, there is a very clear awareness that notification also requires site preservation and will most likely lead to a visit by an inspector and possibly a prosecution.

Even in smaller businesses that do not have a previous understanding of their obligations, the occurrence of a fatality or serious injury will often lead to them seeking information about whether there is a need to report the incident to some regulatory body. Consideration should be given to setting an employer size threshold for any periodic reporting requirements.

Many of the proposed new reporting notifications will not have the same urgency that is created by the current incident notification requirements. PCBUs may still expect an immediate response, whilst regulators may not have the capacity to allocate resources to these additional reports.

If any of these new reporting requirements are put in place, it will be essential that PCBUs are clearly advised of the reason for the reporting and how the regulators will respond to the reports.

Reporting requirements that are not linked to a traumatic incident are more likely to be overlooked or inaccurately recorded and reported. The proposed periodic reporting requirements will most likely result in:

- Unintended non-compliance by smaller businesses that do not understand reporting obligations (unless a size threshold is included).
- Under-reporting by some employers, either intentionally or unintentionally.
- Interventions by WHS regulators in relation to the employers with the most accurate and compliant reporting (higher reported incidence of reportable scenarios, which may not be the most efficient use of the regulators resources.

Significant education will be required to ensure that smaller businesses do not become non-compliant due to not having an understanding of the reporting requirements.

We also wish to highlight that any new incident notification or reporting requirements will need to consider which PCBU will hold the duty. The concept throughout the WHS laws is that a PCBU owes a duty (rather than an employer) and for this reason many of the obligations, including those related to incident notification use the words “ensure” that something occurs, rather than necessarily being the one that takes the action. In relation to some of the proposed notification and reporting requirements the obligation may need to be placed specifically on either the employer or on the PCBU that controls the workplace.

Specifically, proposed notification obligations relating to various proposed psychological injuries and hazards are dependent upon a PCBU’s knowledge or access to information needed to inform an assessment as to whether any relevant threshold has been met to active the notification obligation.

For instance, relevant information relating to a worker's hours of work, periods of leave, emergency contact information, personal and sensitive information (such as medical information) will generally be kept by the employer in accordance with obligations under the *Fair Work Act 2009 (Cth)* and *Privacy Act 1988 (Cth) (**Privacy Act**)*. Records relating to work performance, any work conduct issues (including in relation to co-workers) and grievances will also generally be records kept by the employer as they relate to obligations of the employer and employee under the employment relationship.

Such information is not necessarily or readily accessible by PCBUs who are not the employer of the relevant worker, particularly in relation to worker information covered by the National Privacy Principles (**NPPs**) or fall outside the current employee record exemption in the *Privacy Act.*[1]

It also raises the problem of duplicate reporting by multiple PCBUs on the same incidents, which if the purpose of the data collection is for WHS regulators to better target their regulatory and educative functions throughout the community, may not in fact be a reliable source of information.

Finally, we are concerned about the complex factual assessments that will be required by PCBUs when notifying or reporting any of the circumstances that relate to psychosocial risks and exposures. The employer will not always have all the necessary data to make an informed decision regarding the circumstances and, particularly in the case of SMEs will not have the skills or knowledge to determine how best to progress any assessment and analysis to determine notification or reporting requirements.

Our submission will follow the same flow as the consultation paper, rather than addressing our concerns in their most significant order.

Periodic reporting of incapacity periods.

This proposal suggests periodic reporting (six monthly) of periods of incapacity from normal work for ten or more consecutive days due to a psychological or physical injury, illness or harm arising out of the conduct of the business.

This approach, focusing on incapacity from normal work rather than absence from work, is the only way that this provision could apply without creating perverse outcomes and gaming of the reporting processes.

[1] See Ai Group's submission in response to the Australian Government's Privacy Act Review Report relating to increasing privacy protections for employees and narrowing the current employee record exemption.

However, Ai Group does not support this proposal for the reasons outlined below.

- The requirement to provide this information to the WHS regulator will create a significant risk of non-compliance, especially amongst smaller businesses who may not understand the reporting obligations. Further, the value of receiving six-monthly reports of a small number of injuries (or no injuries at all) from smaller businesses is questionable, as we think it unlikely that the regulator would allocate resources to intervening with these businesses.
- The reporting obligations will be in addition to workers' compensation notification and claim lodgement requirements that will not neatly translate into just providing the same information to the WHS regulator.
- Ai Group is not convinced that the large amount of data captured by the WHS regulators will be used in a way that justifies the regulatory burden on PCBUs and/or the costs incurred by the regulator to establish systems for receiving reports and analysing data. If regulators are unable to demonstrate the value of the data they will be receiving, this proposal should not be progressed.

If such a requirement was to be introduced, it should be linked to the acceptance of a workers' compensation claim. In situations other than traumatic incidents, an employer would not be in the position to determine whether something occurred out of the conduct of the business, without that external appraisal being undertaken.

If this requirement is to be introduced the incapacity period could not be less than 10 days.

We note that in the United States, medical certificates for psychological injuries must be sign-off by a physician or other licensed health care professional with appropriate training and experience in order for it to be considered a work-related recordable injury. Whilst this is not a feature of the Australia workers' compensation scheme, it indicates the difficulties associated with creating a clear connection of psychological injuries to the conduct of work.

This is one of the situations where the obligation would need to be placed on the employer, as other related PCBUs are unlikely to have the necessary information to assess the status of the absence.

If progressed, clear guidance will be required on:

- How to interpret 10 consecutive days of incapacity. With many people not working a standard 9 to 5, Monday to Friday week (eg., rotating shift rosters, rostered days off, irregular or changing hours for casual employees), some work arrangements may lead to serious injuries not meeting this criteria, whilst the same period of incapacity in other workplaces may result in less than 10 working days being involved.

- What level of incapacity creates a reporting obligation. A serious leg injury may not reduce the work-related capacity of a supervisor but have a significant impact on a labourer.

Attempted suicide, suicide and other deaths

Suicide or other death due to work-related psychological harm

Ai Group believes that there are significant issues associated with this proposal.

The Act currently requires that:

> *A person who conducts a business or undertaking must ensure that the regulator is notified immediately after becoming aware that a notifiable incident arising out of the conduct of the business or undertaking has occurred.*

Both options 1 and 2 require the PCBU to determine whether a suicide has occurred. This is inappropriate. There are many situations where the PCBU will not be privy to the necessary information to make that assessment. Indeed, in many cases the cause of death may need to be confirmed by medical or policing authorities. After an unexpected death there is often speculation about whether suicide was the cause, and an employer should not be relying on such speculation to determine notification requirements. It would be inappropriate to make inquiries of the kind that may increase the distress of the family.

We note that option 1 also considers the death of a person due to work-related psychological (e.g. heart attack following exposure to trauma). Although this would be less sensitive than suicide, we still believe it is inappropriate to be reporting health conditions to the WHS regulator unless an appropriate representative of the worker indicates that they believe there was a relationship to work.

Whilst option 2 would mean that the employer would not need to determine that a suicide is connected to work, they would still need to first know that the cause of death was suicide. In many instances the cause of death may not be known, or dependent upon investigation and confirmation by medical or policing authorities. It would seem to be inappropriate to be notifying the WHS regulator of a suicide if it has no connection to work. This could be seen to be a significant breach of privacy, with the PCBU stepping way outside their role as a PCBU.

If either of these options is to be progressed there would need to be very clear processes established about how the WHS regulator would respond to such a notification. We cannot see an appropriate way for the WHS regulator to engage with the family unless the family had confirmed with the employer that it was a suicide, and they believe it is due to work.

The circumstances of a suicide at a workplace are different to the issues considered above. If a death occurs at work, most employers will already believe that it was notifiable and that relevant investigations would be carried out by the WHS regulator. Ai Group would not have an

objection to this proposal to modify guidance to ensure that PCBUs understood that any death at a workplace is notifiable, with the WHS regulator logically being involved in the investigation.

Attempted suicide

Ai Group has similar concerns with this proposal as with the proposals for suicide. However, we think there is even greater risk given that the worker may still be vulnerable and any notification by the employer and investigation by the WHS regulator could exacerbate their condition.

This option includes a statement that "A PCBU would not be required to notify where an attempted suicide could not reasonably have been completed." It is unclear how the average employer would be able to make this assessment. It is also unclear whether this means that the attempt could not have resulted in a suicide, or if the potential self-harm could not be viewed as significant enough to be considered a suicide attempt.

It is our view that, if this option is to be progressed notification should only occur if the worker, or an appropriate representative, advises the employer that there are circumstances which make it likely that work contributed to the suicide attempt.

We would not support the optional add-on that would require a PCBU to report all attempted suicides to the WHS regulator, without determining whether there was any link to work. Whilst this might be seen as making it easier for the employer, it may pose significant risk of breaches of privacy.

Capturing workplace violence

Ai Group acknowledges the importance of capturing workplace violence as a notifiable incident in circumstances where there is a serious injury or a serious threat.

We do not object the inclusion of sexual assault and serious physical assault, as it allows the regulator to investigate the systemic causes or the lack of control measures that allowed the assault to take place. However, it will be important that all parties involved understand the approach that the WHS regulator will be taking (a systemic view) as compared to any response by the police (an individual case assessment).

We also agree with the position that notification of a sexual assault should be de-identified data. In most cases, this will require changes to systems and forms. If PCBUS are completing the notifications online, this may be easily achieved with smart forms only asking for the information necessary to make each specific type of notification. If standard forms require all information before progressing the report or don't stop identifying data being included, privacy breaches could occur. Unintended breaches are also highly likely when hard copy or PDF forms are utilised.

In relation to the other categories in this option, there are difficulties with the definitions. Both of the scenarios in (c) and (d) will require significant analysis that may be subjective in nature. If these are progressed the descriptions currently used in the body of the paper will be necessary, but possibly insufficient, to provide the necessary clarity to determine notification requirements.

Ai Group agree that the optional add-on to allow for alternative reporting arrangement is important in scenarios where the nature of the work means that violent interactions are an inevitable part of the work, e.g. policing. We believe that this can be done in a way that does not detract from the obligations to eliminate or minimise risk as far as reasonably practicable.

Periodic reporting of exposures to traumatic events

The paper acknowledges that these exposures are likely to occur in circumstances where the occurrence is frequent and part of the role. WHS regulators should be able to identify these organisations by the type of work that they do and initiate interventions without the need for periodic reporting.

It is Ai Group's view that there is no value in introducing this reporting requirement.

If this option is progressed, we would support the additional add-on to allow for alternative reporting processes.

Periodic reporting of bullying and harassment

Ai Group is not convinced that mandatory periodic reporting obligations on PCBUs in relation to bullying and harassment complaints and instances will be an effective intervention to reduce unlawful workplace conduct. Imposing an obligation on PCBUs to undertake periodic reporting of bullying and harassment to WHS regulators is a very significant and complex requirement that has a range of possible unintended consequences.

We are also not convinced that the case for general data collection on bullying and harassment has been properly made out, relative to increased WHS regulator resources, the rights (and perhaps added distress) of individuals concerned and the resulting regulatory burden on PCBUs.

If the proposal is to proceed, despite Ai Group' position, we have set out our concerns below.

Purpose of the reporting obligation and data collected

Ai Group is concerned that the purpose of data collection through a periodic reporting obligation appears very broad. It would be difficult to ascertain its intended value to the community and how it would precisely improve the functions of WHS regulators. The premise that a high number of complaints of bullying and harassment is an indicator of poor

preventative systems in a PCBU, is not a reliable one. As acknowledged in the consultation paper, complaint numbers can also indicate that the PCBU operates a transparent reporting system in which workers have confidence to raise concerns, as opposed to concerns remaining under-reported and accordingly not dealt with. We are also aware that many PCBUs are currently evaluating and improving their preventative systems to comply with the new positive duty in the *Sex Discrimination Act 1984 (Cth*) and that in doing so, may also trigger an increase in reports of unlawful conduct as workers see improved and new reporting processes within their workplace.

For this reason, Ai Group urges caution over how reporting data would be used by WHS regulators in respect of any proposed targeted enforcement action against individual PCBU, and that PCBUs are incentivised to continue to encourage workers to come forward and to be transparent about matters that need addressing.

In addition, we are concerned about the use of and access to this data, particularly as it relates to identifying a particular PCBU and potential data-sharing with other agencies. For instance, it would be inappropriate for other regulators, such as the Australian Human Rights Commission (AHRC) to access this data for the exercise of its own regulatory functions, such as investigating and issuing compliance notices in relation to suspected non-compliance with the positive duty under the *Sex Discrimination Act 1984 (Cth) (**SD Act**)*. As a matter of policy and due process, the legal rights of PCBUs and individuals under other laws should not be prejudiced as part of a reporting process to WHS regulators for the stated purpose of improving WHS regulator awareness of the levels of bullying and harassment across occupations and industries and informing education and compliance activities.

Consequences on PCBU prevention and worker reporting

A significant concern is the potential reduction of early reporting, which enables a PCBU to intervene and minimise risk. A reporting obligation that indirectly enables persons or PCBUs to be identified, or creates adverse outcomes for PCBUs who do report, may serve as disincentives for workers to raise concerns and for PCBUs to engage with those concerns transparently. Any reporting framework should not lose sight of the types of behaviours a regulator would want to encourage.

It has been repeatedly established that workplace sexual harassment in particular, is significantly under-reported in Australian workplaces.[2] A worker who is seeking assistance to deal with bullying and harassment is often concerned about the confidentiality associated with raising issues - ranging from sensitivity in relation to the conduct itself, to concerns of an

[2] See Time for Respect: Fifth National Survey on Sexual Harassment in Australian Workplaces, 30 Nov 2022

elevated threat to victimisation by co-workers or other third parties. To this end, we note that section 47C of the *SD Act* now imposes a new 'positive duty' on PCBUs to eliminate victimisation in relation to certain types of unlawful conduct. The AHRC will also commence its new enforcement and compliance function in relation to PCBU compliance with the positive duty on 12 December 2023. Reporting obligations that unintentionally elevate the risk of victimisation or entrench the under-reporting of unlawful conduct should be avoided.

Even de-identified reporting may make a worker wary about raising the issue. This would particularly be the case if the reports are made available to health and safety representatives (HSRs) or health and safety committees (HSCs). The fact that reporting is de-identified does not mean that the individuals will not be identified internally due to the description of the incident, or at least create speculation about the person's involved in the incident.

If this reporting is progressed, it is essential that the reports should be "carved out" from information that a health and safety representative (HSR) can access. This is because, data that is de-identified when sent to a regulator may still be able to identify the workers involved, or at least create speculation, when looked at within the workplace.

Threshold for reportable conduct is inappropriately low

The two options canvassed in the consultation paper in defining reportable conduct are both problematic.

In relation to both options, the threshold of reportable complaints by reference to whether "*behaviour may reasonably be considered to have occurred"* is different to the threshold of "*on the balance of probabilities*" used to substantiate complaints in workplace investigations. Generally, the "balance of probabilities" is a relevant evidentiary threshold applied by various courts and tribunals in civil matters in determining whether the relevant conduct occurred. The balance of probabilities generally involves an assessment of whether a fact (or behaviour) is proved to be true if its existence is more probable than not,[3] as opposed to whether the conduct may only "reasonably be considered to have occurred."

While the two thresholds may appear similar, we envisage that there may be instances where PCBUs are required to report on matters that have not been substantiated either by their own formal inquiries or as concluded by a Court or tribunal. This raises the question as to the utility and value of the data collected by WHS regulators and also the confusion and complexity for

[3] For instance see the Fair Work Commission's Sexual Harassment Benchbook in the application of the balance of probabilities in respect of its sexual harassment dispute jurisdiction.

PCBUs and affected workers in having to apply two different thresholds for determining relevant conduct for different purposes.

The problems raised earlier with a requirement on PCBUs, as opposed to the direct employer are more pronounced in relation to workplace conduct. Privacy laws do not easily enable a PCBU to automatically collect personal information from a non-employee that may be relevant to a particular conduct issue, and neither would there likely be an agreement between the employer and non-employee (such as an employment agreement) upon which the employer could rely to require consent to such disclosure.

If, despite Ai Group's position, a periodic reporting obligation is proposed, then it should be limited to "*after a PCBU* **becomes aware of the behaviour**, *or where the behaviours have been substantiated on the basis that it more likely occurred than not*." This approach would maximise the value of reporting data as containing information that has been verified by the PCBU's own knowledge or substantiated based on its own inquiries.

A further problem is the threshold on the types of behaviours an employer may receive that would trigger or be included in any reporting obligation. For this purpose Ai Group does not support option 1 in capturing a broad range of unreasonable behaviour. We do not consider this to be particularly useful for WHS regulators and it would be onerous and ambiguous for PCBUs to identify what was a reportable behaviour or not.

Reportable behaviour should be limited to the behaviours outlined in option 2. Option 2 focuses on unlawful behaviours that would readily feature in many PCBU policies and codes of conduct, enabling an easier identification of the behaviour by PCBUs in determining reporting obligations.

Long latency diseases – exposure to substances

We note that this section of the paper raises a series of questions, rather than proposing options. This indicates that it has not been possible to identify any strong options for dealing with exposure to substances.

Ai Group agrees that it is important to improve the knowledge of exposure to hazardous substances in workplaces. However, this is difficult to achieve.

The difficulty when considering how we record and report "exposures" in the workplace requires the consideration of two factors; whether the airborne concentration of an airborne exceeds the workplace exposure standard (WES) and the level of protection that is provided by respiratory protective equipment (RPE). If a PCBU has done all that is reasonably practicable applying the hierarchy of controls, and implemented an effective RPE program that provides the necessary level of protection, there is no breach of the law if the airborne concentration is above the WES.

Accordingly, whilst the measurement of an airborne concentration of a hazardous chemical is important to determine control measures in the workplace, including the use of RPE, reporting of airborne concentrations provides no value to the regulator.

We do not see statements of exposure to be of relevance for the majority of chemicals.

Ai Group has not been able to identify an appropriate way to use the incident notification or reporting systems to increase regulator knowledge of "exposures" to hazardous substances.

Other approaches to data gathering and understanding specific industries may be necessary.

Serious head injuries

It is Ai Group's view that the best response to address this gap is to adopt options 1 and 2. We would not support option 3 as it is not possible to create a different definition of "immediate" for this set of circumstance without affecting other scenarios.

Other potential gaps in 'serious injury or illness'

Ai Group supports the two amendments that are proposed. There are many situations now when people are treated as outpatients in circumstances where they would previously have been admitted to hospital. Amending the provision to cover treatment as an outpatient or inpatient would be appropriate and ensure that employers do not find themselves inadvertently in breach of the provisions whilst they wait to find out if the person is admitted.

In relation to serious crush injuries and serious bone fractures, it is our view that including them as specific items in the notification requirements would be helpful. PCBUs do not necessarily think of these as "loss of bodily functions", even though they are defined as such in the guidance material. This change would create certainty and clarity for PCBUs and help to avoid unintended non-compliance.

Capturing incidents involving large mobile plant

It has always seemed to be an anomaly that the only plant covered in the dangerous occurrences was plant that is required to be design or item registered under the regulations. Many other pieces of mobile plant, including forklifts, are known to be a major risk in workplaces and serious incidents involving them should be notifiable.

We agree that the occurrences that should be captured are:

- The plant overturning
- A person being pinned by or ejected from the plant
- Roll-aways

In relation to the plant colliding with a person or thing, this should be limited to "in circumstances where there was a serious risk of injury". We do not think it is appropriate to notify in a situation when, for example, a forklift hits a barrier that is in place because it is recognised that this interaction may occur.

Capturing the fall of a person

Ai Group supports the inclusion of "the fall of a person that exposes a person to a serious risk of to health and safety (death or serious injury). However, as indicated in the paper, clear guidance will need to ensure that PCBUs understand that it is only falls that pose a serious risk that need to be reported.

Addressing minor gaps and ambiguities in the current incident notification provisions

Causal link principle: Subject to drafting, Ai Group supports more clarity around the causal link principle being included in the Act.

Objective test: Ai Group believes that this is a particularly difficult concept to describe in law. We also believe it is unreasonable that an employer would be expected to make a determination that an injury or illness warranted treatment, if none was received.

Immediate treatment: Ai Group supports the amendment of the definition of "immediate treatment" to include urgent medical care, e.g. ambulance response. In principle, we support the inclusion of guidance around the objective test. However, we are concerned that it is not appropriate to expect a PCBU to make an assessment of whether treatment as an inpatient was necessary although not provided.

Loss of bodily function: Ai Group agrees that better information about the definition of loss of bodily function is required in the guidance material.

Medical treatment from exposure to a substance: Ai Group supports amending the definition of immediate medical treatment to include health professionals who provide urgent treatment following exposure to a substance. It is our view that paramedics would be clear inclusions. In circumstances where work is in a remote location with significant inhouse response services, it may also be appropriate to include those services.

Exposure to human blood and body substances: It would be unclear to PCBUs that the interventions following exposure to human blood and body substances would be considered medical treatment. If it is the intention to capture these via 36(c) we agree that this should be clearly articulated in guidance. Alternatively, it may be more appropriate to specifically identify exposures to human blood or body substances as a dangerous occurrence that needs to be notified.

Infections and zoonoses: It is problematic that the infections and zoonoses included in regulation 699 do not have a high visibility within the incident notification scheme. Ai group supports the development of more prominent guidance. We also believe that it would be also beneficial to reference regulation 699 specifically in regulation 37(l) which states:

> *(l) any other event prescribed by the regulations,*

This specific reference could not be included when the model WHS laws were written as the Act was finalised before the regulations were drafted. As the outcome of this review will most likely lead to amendments to the Act, it seems a logical time to make this cross reference – either in the body of the provision, or as a note.

Dangerous incident provisions – reducing complexity and improving PCBU understanding: Ai Group supports the proposal to amend guidance material to provide better clarity for PCBUs. In relation to amending the legislation, we agree in principle, subject to reviewing the draft provisions. It is important that any rewording does not inadvertently increase notification obligations.

Improving the electric shock provision: Ai Group supports the proposed amendments to the legislation and agrees that guidance on this topic should be improved.

Duty to notify and site preservation requirements:

Create a specific obligation to notify other duty holders: It is Ai Group's view that the duty to consult, cooperate and coordinate clearly establishes this obligation. However, for the purposes of clarification we do not object to this being expressly included in the Act. It is important however, that there is a delineation between these obligations related to notifications and what might be required in relation to the new reporting obligations, particularly where sensitive information is involved.

Amend the duty to preserve the incident site: Ai Group does not see how an employer would believe that they can disturb an incident site once an inspector has arrived on site, without the inspector giving a clear indication that this could occur. However, for the avoidance of doubt, we do not object to the amendment.

Amend guidance: Ai Group supports the development of more detailed guidance on the duty to notify and site preservation requirements.

About Australian Industry Group

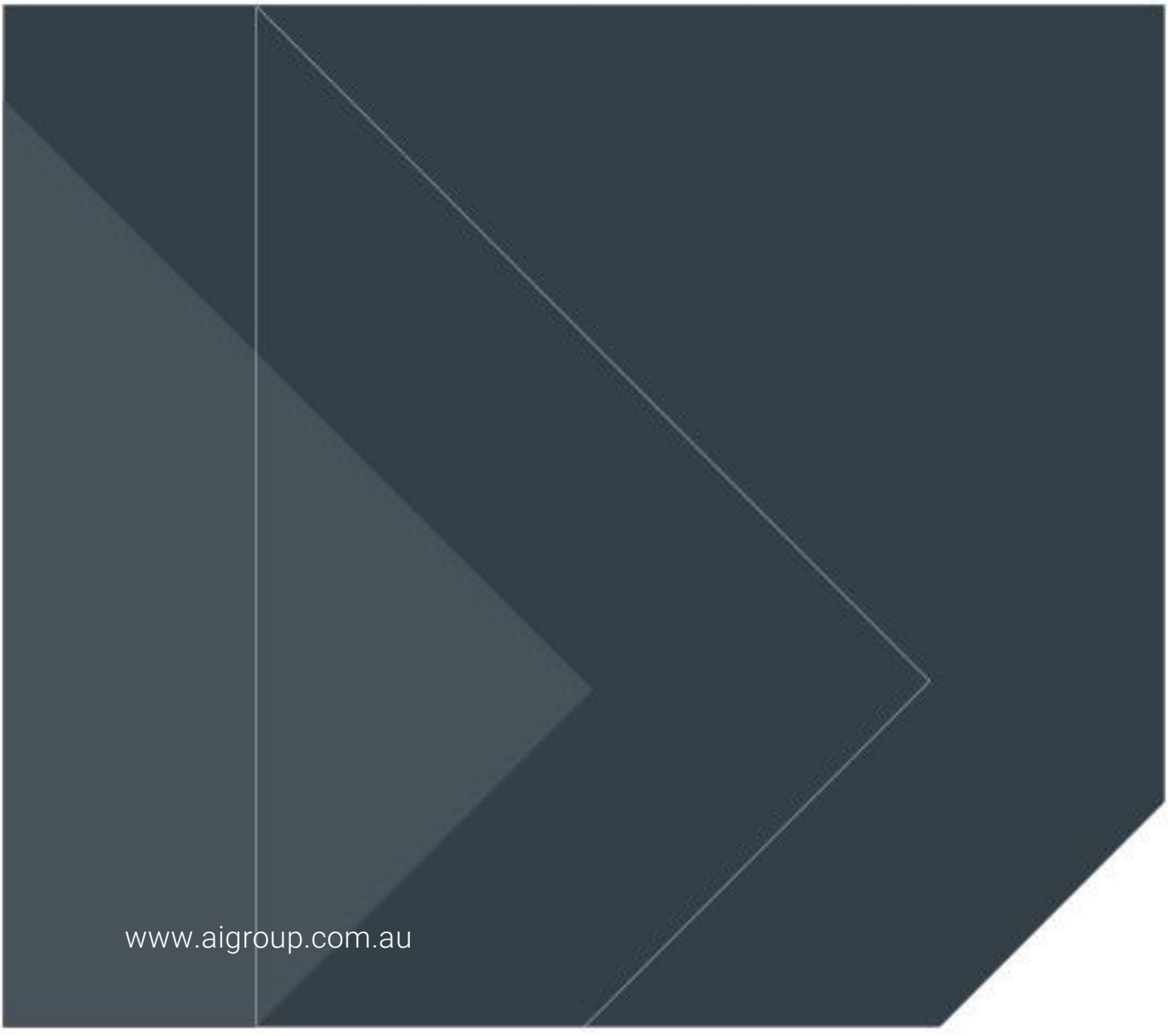
The Australian Industry Group (Ai Group®) is a peak national employer organisation representing traditional, innovative and emerging industry sectors. We have been acting on behalf of businesses across Australia for 150 years.

Ai Group and partner organisations represent the interests of more than 60,000 businesses employing more than 1 million staff. Our membership includes businesses of all sizes, from large international companies operating in Australia and iconic Australian brands to family-run SMEs. Our members operate across a wide cross-section of the Australian economy and are linked to the broader economy through national and international supply chains.

Our purpose is to create a better Australia by empowering industry success. We offer our membership strong advocacy and an effective voice at all levels of government underpinned by our respected position of policy leadership and political non-partisanship.

With more than 250 staff and networks of relationships that extend beyond borders (domestic and international) we have the resources and the expertise to meet the changing needs of our membership. We provide the practical information, advice and assistance you need to run your business. Our deep experience of industrial relations and workplace law positions Ai Group as Australia's leading industrial advocate.

We *listen* and we *support* our members in facing their challenges by remaining at the cutting edge of policy debate and legislative change. We *provide solution-driven* advice to address business opportunities and risks.



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