

Involving the workforce

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Core concepts

- In relation to the submission to NOPSEMA of either a new or revised safety case for a facility, the operator must demonstrate to NOPSEMA's satisfaction that in the development of the safety case there has been effective involvement of the workforce. This demonstration must be supported by adequate documentation.
- The safety case for a facility must contain adequate provisions for workforce involvement such that members of the workforce are able to arrive at informed opinions about the risks and hazards to which they may be exposed on the facility.
- The operator must take all reasonably practicable steps to provide all members of the workforce with the information, instruction, training and supervision training necessary for them carry out their work safely. This should include access to the safety case and related documents.
- Both the operator of a facility and its workforce have duties of care in relation to health and safety.
- Effective workforce involvement requires careful consideration of:
 - the reasons for workforce involvement
 - who should be involved
 - the timing and duration of involvement
 - the subject matter
 - where the involvement should take place
 - how the workforce should be involved.
- Effective workforce involvement requires the commitment, cooperation and competence of all parties involved.

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Abbreviations/acronyms

ALARP	As low as reasonably practicable
FD	Facility description
FSA	Formal safety assessment
HAZID	Hazard identification
HAZOP	Hazard and operability study
HSR	Health and safety representative
MAE	Major accident event
NOPSEMA	National Offshore Petroleum Safety and Environmental Management Authority
OHS	Occupational health and safety
OPGGs Act	<i>Offshore Petroleum and Greenhouse Gas Storage Act 2006</i>
Safety Regulations	Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2024
SMS	Safety management system

Key definitions for this guidance note

The following are some useful definitions for terms used in this guidance note. Unless prescriptively defined in the *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGs Act) or Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2024 (OPGGs(S)) [as indicated by the square brackets] they are a suggested starting point only.

Health and safety representative	A person selected as a health and safety representative for a designated work group under Clause 25 of Schedule 3 to the OPGGS Act. [OPGGs(S) Regulation 1.5]
Health and safety committee	A group consisting of members chosen by the workforce representing the interests of the workforce, and members chosen by the operator representing the interests of the operator, which is responsible for assisting in the development, implementation, review, and update of measures designed to protect the health and safety of members of the workforce, and for facilitating cooperation between the operator and the workforce in relation to occupational health and safety matters.
Involving the workforce	Consultation with and participation of members of the workforce.
Member of the workforce	In relation to a facility, means an individual who does work at the facility: (a) whether as an employee of the operator of the facility or of another person; or (b) whether as a contractor of the operator or of another person. [OPGGs Act Schedule 3, Clause 3]

1. Introduction

1.1. Intent and purpose of this safety case guidance note

This document is part of a series of documents that provide guidance on the preparation of safety cases for Australia's offshore facilities, as required under the Commonwealth Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2024 [the OPGGS(S) Regulations] and the relevant corresponding laws of each State or Territory, where powers have been conferred on NOPSEMA.

This guidance note explains the requirements for workforce involvement in safety case development and revision and provisions in a safety case for effective consultation with, and effective participation of, the members of the workforce as well as general guidance on effective involvement. This guidance note also summarises and consolidates related material contained in other safety case guidance notes.

It is envisaged that this guidance note will be of use to those with responsibility for planning and developing the facility safety case, those involved in safety case implementation, maintenance, and ongoing risk management, and also the Health and Safety Representatives, OHS Committee members and members of the workforce in general that are involved in the development, revision and implementation of their facility's safety case.

Figure 1 illustrates the scope of the NOPSEMA safety case guidance notes overall, and their interrelated nature. This guidance note, *Involving the Workforce*, should be read in conjunction with the other relevant guidance notes; the full set is available on the NOPSEMA website.



Figure 1 - Safety Case Guidance Note Map

The purpose of the guidance is to explain the objectives of the regulations, to identify the general issues that should be considered, and to provide practical examples to illustrate the concepts and potential approaches that can be taken in the preparation of safety cases.

The guidance is intended for use by industry and NOPSEMA inspectors in the preparation and assessment of safety cases respectively. It is not however, the intention of the guidance to provide detailed approaches or detailed regulatory assessment criteria.

Guidance notes indicate what is explicitly required by the regulations, discuss good practice and suggest possible approaches. An explicit regulatory requirement is indicated by the word **must**, while other cases are indicated by the words **should**, **may**, etc. NOPSEMA acknowledges that what is good practice and what approaches are valid and viable will vary according to the nature of different offshore facilities and their hazards.

Whilst this guidance note puts forward a selection of the possible approaches that operators may choose to explore in addressing requirements for workforce involvement contained in the OPGGS Act and the OPGGS(S) Regulations, the selection is not exhaustive, and operators may choose to use other techniques not covered by this guidance note.

This guidance note is not a substitute for legal advice on interpretation of the regulations or the Act under which the regulations have been made.

Summary tables of the legislative requirements are included as a quick reference throughout this document. **However, the reader is encouraged to work directly from the regulations.**

2. The role of the workforce

Access to, and understanding of, the safety case by the workforce is important as this is one of the key health and safety documents for a facility.

The regulations recognise that the safety case and the safety management system (SMS) need to accurately represent the actual facility, its hazards and the reality of how operations are, or will be, carried out. For this to be the case, it is necessary to take account of the knowledge and views of the workforce with regard to the facility, the nature of its hazards, the ways in which MAEs may arise, and the types of controls that may be effective.

In addition, the workforce needs to be provided with information (such as the operating, safety and emergency procedures in place), so they understand what actions to take to support safe operations and minimise the impact on the health and safety of personnel in the event of an emergency.

Responsibility for safety improvement and preparation of the safety case will always remain with the operator, but involvement of the workforce in the specified activities supports key objectives:

- an understanding is developed of the hazards and risks, and informed decisions are made concerning the control measures and safety management systems implemented to control these risks
- members of the workforce are fully informed about the risks to which they may be exposed, the control measures and safety management system which provide the means of eliminating or reducing those risks, and the safety case which presents the case for adequacy of the technical and other control measures such as those detailed within the SMS.

Operators who meet the above objectives can expect the following results:

- members of the workforce who have an active role in implementing the controls and safety management systems are also better aware of their own responsibilities

- a positive safety culture is promoted and/or encouraged, with a high level of workforce involvement in MAE identification and control, and awareness of other safety issues.

If there are health and safety concerns at a facility, people on the facility should raise these concerns with their supervisor, OHS Committee or Health and Safety Representatives (HSRs) as appropriate. To clarify the health and safety requirements that may apply to a specific situation at a facility, reference can be made to the health and safety laws and to the safety case for the facility, as all work at a facility must be conducted in a manner that it not contrary to the safety case in force for the facility. If in doubt, advice may be sought from a NOPSEMA inspector.

3. Safety case requirements

3.1. Workforce involvement

Involvement of members of the workforce – Reg 2.11

- (1) The operator of a facility must demonstrate to NOPSEMA, to the reasonable satisfaction of NOPSEMA, that:
 - (a) in the development or revision of the safety case for the facility, there has been effective consultation with, and participation of, members of the workforce; and
- (2) A demonstration for paragraph (1) (a) must be supported by adequate documentation.
- (3) In subregulation (1):

members of the facility's workforce includes members of the facility's workforce who are:

 - (a) identifiable before the safety case is developed; and
 - (b) working, or likely to be working, on the relevant facility.

Note: Part 3 of Schedule 3 to the OPGGS Act sets out the broad consultative provisions that apply, including provisions for the establishment of designated workgroups, the election of health and safety representatives and the establishment of OHS committees.

The arrangements under these consultative provisions should be used for consultation with members of the workforce about the development, preparation and revision of the safety case.

Operators should think carefully about the level of involvement of the workforce that is necessary to constitute full compliance with the requirements of Regulation 2.11 with respect to safety case development.

In order to achieve the objectives of producing a safety case that accurately reflects the reality of activities and operations on the facility, the operator needs an appropriate level of involvement of members of the workforce. It is essential the operator uses the specific knowledge that the workforce has in identifying hazards, assessing risks, and adopting control measures.

In the development of a safety case (or revised safety case), the operator of a facility must demonstrate to NOPSEMA's satisfaction that there has been effective consultation with, and participation of, members of the workforce. This particular demonstration does not necessarily need to be included within the safety

case itself; but it must be supported by adequate documentation. However, as the safety case is the key health and safety document for the facility, it may be the best place to document the demonstration required.

A documented demonstration for the purposes of this regulation could include a combination of:

- a description of the process by which the workforce was involved in safety case development inclusive of specific references to the actual SMS document(s) (a copy or summary of applicable documentation could also be submitted with the safety case); supported by
- actual records clearly identifying which participants were members of the workforce as defined above.

As per the note to Regulation 2.11, the broad consultative arrangements provided for in Part 3 of Schedule 3 to the OPGGS Act should be used in this context. These arrangements include the establishment of designated work groups, the selection of health and safety representatives and the establishment of health and safety committees.

Further guidance is available in the NOPSEMA guidance note: Workplace arrangements

Further guidance is available in: The HSR Handbook: A guide for health and safety representatives in Australia's offshore petroleum industry.

NOPSEMA recognises that in some instances a safety case may be developed before the entire workforce is recruited. This means that the expectation to consult with 'members of the workforce' is seen as being difficult to achieve.

NOPSEMA suggests that in such cases it is incumbent on the operator to consult as much as is reasonably practicable. This can be done in a number of ways; seeking input from the workforce on other facilities of a similar type, consulting with those members of the workforce who are available, seeking input from organisations that typically employ members of the workforce who undertake similar activities (e.g. contractors).

In any event, the operator of the facility should ensure that they have satisfied NOPSEMA about how they have attempted to meet these expectations, what results were achieved and if there are any remaining steps they intend to take once further members of the workforce are available for consultation.

3.1.1. Formal safety assessment process and description

Workforce involvement is commonly centred on aspects of the formal safety assessment (FSA). In particular, the workforce is most likely to be involved in hazard identification activities with significant albeit lesser involvement in risk assessment and control measure identification activities.

The FSA includes a process of debating, analysing, creating and sharing views, information and knowledge on the risk of major accident events and the means to prevent or mitigate them. It must include the active participation of people at the 'coal face' who influence safe operation, and hence hazard identification and risk assessment roles should be defined for members of the workforce.

The FSA should not be limited to desktop theoretical studies. It can include any activity the operator employs to understand the facility and its risks. For example, an FSA could incorporate information from incident investigations, discussions during safety meetings regarding hazards and ways of controlling them, condition monitoring programs, analysis of process behaviour, evaluation of trends or deviations from critical operating parameters, procedure reviews, etc.

The knowledge generated by the FSA should be captured, managed and disseminated to ensure it remains up to date and is used in the design, operation and maintenance of the facility. The management of knowledge generated through hazard identification and risk assessment will also greatly assist the efficient development of a safety case for the facility. For example, these processes will assist in handling assumptions, actions arising, etc. through the safety case development process.

It is recognised that it is often not possible/practical to involve everyone in the hazard identification, risk assessment and control measure identification and selection processes. Therefore, it is important that regular feedback is provided to the rest of the workforce. This feedback should take the form of communicating the hazards that are present, the risks associated with those hazards, the controls in place and any recommendations arising. The workforce should also be provided with an opportunity to review and comment on the FSA outputs. This is important both as a quality control activity and as part of the mandatory workforce consultation and participation required by the OPGGS(S) Regulations. It also fosters a feeling of ownership among personnel not directly involved in the process.

Workforce involvement in the FSA description can assist in ensuring the accessibility of the safety case. Input by the workforce on the language and terminology used in the FSA description, in particular, can ensure that the safety case becomes a key resource for all members of the workforce to become informed about the hazards and risks to which they may be exposed whilst on the facility. Clear descriptions of the key inputs and assumptions associated with individual safety studies described may also provide the workforce with a useful frame of reference when undertaking subsequent task-based risk management activities on the facility.

3.1.2. Facility description and safety management system description

NOPSEMA understands that the levels of workforce involvement in both the facility description and safety management system (SMS) description are generally lower than the level of workforce involvement in the FSA, there are nevertheless significant benefits in such involvement. In terms of the descriptions contained in the safety case the same potential benefits as involvement in the FSA description apply, namely improved accessibility and the likelihood the safety case will be seen by the workforce as a useful resource.

3.1.3. Improving the effectiveness of workforce involvement

In addition to identifying where the workforce had been effectively involved in safety case development and revision, NOPSEMA has also identified several areas that operators should consider to improve the efficacy of workforce involvement. Planning, purpose and process, and training associated with workforce involvement in safety case development and revision have been identified as areas to which operators should pay particular attention.

As noted earlier planning for workforce involvement in the development of a safety case presents a number of unique challenges for which there are limited practicable solutions. With respect to revision to a safety case, the fundamental planning challenges are time-related. Effective consultation with and participation of members of the workforce in a safety case revision necessitates that, before a decision is made and the revision is finalised:

- members of the workforce are provided with the proposed revision in a timely manner
- they are given appropriate time to review, consider and comment on the proposed revision

- the operator has allowed appropriate time to consider and consult with the workforce on any comments.

As suggested in Regulation 2.11, operators should consider using designated workgroups, HSRs and/or the health and safety committee to facilitate effective consultation with, and participation of, members of the workforce in a safety case revision. The use of one or more of these workplace arrangements may assist in planning by reducing the number of people involved in the operator/workforce interface. However, the use of these arrangements may also require there to be consideration of processes and planning to ensure effective communication with the wider workforce.

Clarity of purpose and process for consultation with, and participation of, members of the workforce regarding safety case revisions is fundamental to its effectiveness and should be an integral early planning step.

3.2. Effective workforce consultation and participation

Involvement of members of the workforce – Reg 2.11

- (1) The operator of a facility must demonstrate to NOPSEMA, to the reasonable satisfaction of NOPSEMA, that:
 - (b) the safety case provides adequately for effective consultation with, and the effective participation of, the members of the workforce, so that they are able to arrive at informed opinions about the risks and hazards to which they may be exposed on the facility.
- (3) In subregulation (1):

members of the facility's workforce includes members of the facility's workforce who are:

 - (a) identifiable before the safety case is developed; and
 - (b) working, or likely to be working, on the relevant facility.

The workforce needs to be provided with information so they understand what actions to take to support safe operation, and to minimise the impact on the health and safety of people in the event of an emergency. Involvement of employees in the specified activities supports the following key objectives:

- an understanding is developed of the hazards and risks, and informed decisions are made concerning the control measures and safety management systems implemented to control these risks; and
- members of the workforce are fully informed about the risks to which they may be exposed, about the control measures and safety management system which provide the means of eliminating or reducing those risks, and about the safety case which presents the demonstrations and arguments for adequacy of the safety management system (SMS) and technical control measures.

Meeting the above objectives can be expected to result in members of the workforce who have an active role in implementing, managing and maintaining the technical controls and the supporting processes and procedures described in the SMS, and who are also better aware of their own roles and responsibilities in relation to these controls.

Provisions for effective consultation with, and the effective participation of, the members of the workforce, should be included in processes for the development and maintenance of both the safety case and the SMS, including emergency response plans and associated drills and exercises. Operational processes for task-based hazard identification and risk management as well as management of change and permit to work systems are also prime candidates for including provisions for workforce consultation and participation.

Further guidance is available in the NOPSEMA guidance note: Safety Management Systems and Safety Case Content and Level of Detail, and the publication The HSR Handbook: A guide for health and safety representatives in Australia's offshore petroleum industry.

4. Effective workforce involvement

Effective workforce involvement should result in an informed workforce that cooperates and collaborates with the operator to promote, develop and review the effectiveness of control measures described in the facility safety case to ensure the health and safety of persons at the facility. The effectiveness of workforce involvement is contingent on a number of elements which are explored in this section in the broader context.

4.1. Why involve the workforce?

Whilst there are legislative requirements to involve the workforce (as addressed in the preceding section), any consideration of what constitutes *effective* workforce involvement should start with a review of the reasons why it is important, which include the following:

- members of the workforce are more likely to work safely if they are involved in worksite planning
- greater awareness of, and commitment to, health and safety – because members of the workforce who have been actively involved in health and safety decisions will better understand those decisions and feel a sense of ownership over the outcomes
- increased workforce understanding of their roles, responsibilities and duties in relation to occupational health and safety
- it helps create a collaborative safety culture and a commitment to safety at all levels of the organisation
- the workforce has the most direct contact with work hazards so should know what the problems are first-hand
- understanding the views of others leads to greater cooperation and trust that helps to establish and maintain positive working relationships
- In situations where responsibility for health and safety is shared, involvement of the workforce can help address any gaps in managing health and safety risks that often occur when:
 - there is a lack of understanding of how the activities of each person may add to the hazards and risks to which others may be exposed
 - different duty holders assume that someone else is taking care of the health and safety matter
 - the person who takes action is not the best person to do so.

- the outcome of effective workforce involvement is that all parties understand how their activities may affect health and safety and that the actions each party takes to control risks are complementary
- research has shown that the recognition of workforce input and participation improves decision-making about health and safety matters and assists in reducing work-related injuries and disease
- operators have legislative duties that they cannot meet without the input of their workforce.

4.2. Who should be involved?

In relation to a facility, the OPPGS Act defines being a member of the workforce as meaning an individual who does work at the facility: whether as an employee of the operator of the facility; or of another person or whether as a contractor of the operator or of another person.

As noted earlier, the safety regulations also provide for members of the workforce who are identifiable before the safety case is developed; and who are working, or likely to be working, on the relevant facility to be involved in the development or revision of the safety case for the facility.

4.2.1. The role of workplace arrangements

Health and Safety Representatives and health and safety committees can facilitate the process of workforce involvement. Each group has distinct responsibilities under Part 3 of the OPPGS Act. Both the operator and the workforce should have a sound understanding of these responsibilities, to ensure that representation activities are appropriate.

HSRs should be involved in decisions that are likely to affect the health and safety of members of their designated work group. The health and safety committee, meanwhile, should be involved in decisions that are likely to affect health and safety across the workforce.

The establishment of HSRs and health and safety committees are legally required only when requested by the workforce. However, the existence of HSRs and health and safety committees and their subsequent activities can assist operators in meeting the requirements of the legislation pertaining to workforce involvement (see [section 3](#)). Therefore, operators may wish to encourage the workforce to request health and safety representation through a HSR and/or health and safety committee and highlight the benefits for both the workforce and the operator that can be achieved through such health and safety representation.

Further guidance is available in the NOPSEMA 'Workplace Arrangements' and 'The HSR Handbook: A guidance for health and safety representatives in Australia's offshore petroleum industry.'

4.3. When should the workforce be involved and for how long?

The legislation does not set any specific timeframes for workforce involvement, but for it to be effective it should be timely. In general, this means there has to be enough time to explain the issues to the workforce, time for them to consider and provide informed responses and time to take into account such responses before a final decision is made. It is advisable to involve the workforce promptly and regularly.

Regular involvement is better than involvement on a case-by-case basis, because it allows for early identification of potential problems. Regular involvement, if conducted appropriately, can also lead to improved relationships between operator and the workforce, facilitating effective dialogue during formal decision-making processes, and more efficient use of time.

The duration of involvement processes will largely depend on the complexity of what the workforce is asked to consider, how many people are involved, and methods of involvement. A simple issue with involvement limited to a smaller number of members of the workforce or their HSRs can probably be dealt with in a few days or addressed routinely through regular channels of involvement. A technical matter requiring time for consideration, or involvement with a larger group, is likely to require a longer period. The key is to work these matters into the involvement process so that the views of the workforce are taken into consideration and the issue is not overlooked.

4.4. What should workforce involvement be about?

The legislation specifies a requirement for workforce involvement in the development and revisions of the facility safety case and more generally so that they are able to arrive at informed opinions about the risks and hazards to which they may be exposed on the facility. The matters that require workforce involvement will vary between operators, depending on the content of the consultation mechanism.

In general, however, there are a few key areas in which workforce involvement is recommended, such as managing risks, making changes, and during incident investigations.

4.4.1. Managing risks

Risk management is fundamental to ensuring the health and safety of personnel. Often, members of the workforce can be in the best position to understand and articulate the risks involved in their daily tasks, particularly those risks pertaining to occupational health and safety. Subsequently, decisions concerning risk management processes (i.e. hazard identification, risk assessment, prevention and mitigation strategies) should involve those members of the workforce who are likely to be affected by the decision in question. Their involvement can facilitate effective and accurate identification of new or changed hazards and associated risks, and the identification and development of practical and effective control measures. To achieve optimal outcomes from workforce involvement during these types of decisions, ensure that members and their HSRs have access to relevant information, such as technical guidance and historical data.

4.4.2. Managing change

Change management and risk management are necessarily linked. Changes can influence the health and safety of the workforce. Sometimes the health and safety consequences of changes are not well understood by decision-makers, particularly when the relationship between the change and the health and safety outcome is indirect.

The workforce should be involved in decisions that may impact their health and safety; as such decisions can require significant changes in the risk management behaviour required of affected personnel.

Decisions that should involve the workforce include:

- changes to rosters
- new or modified procedures
- new or modified tools, plant, software, equipment, or substances
- organisational restructuring, such as changes to responsibilities (including the contents of position descriptions), priorities, and reporting lines.

During such workforce involvement, relevant information should be shared with the workforce, including the reasons for the change, and anticipated consequences associated with the change. As mentioned above, sufficient time should be provided for the workforce to understand the proposed changes and provide any feedback, concerns and suggestions. These should be taken into consideration before the final decision is made.

4.4.3. Investigations

Workforce involvement in accident and dangerous occurrence investigations can improve the breadth and accuracy of investigation findings, leading to improved quality of actions to promote organisational learning and prevent similar or repeated occurrences. Such involvement can help to uncover latent conditions that contribute to repeated accidents and dangerous occurrences, which may otherwise be difficult for an investigation team to uncover. Further, workforce involvement is a critical aspect of any incident investigation process applying a fair/just culture approach.

Members of the workforce can often provide a more accurate representation of contextual issues specific to the facility or work group, which may not be well understood by other investigation team members. In particular, members of the workforce are more likely to understand the informal influences impacting behaviour in the work group. Such influences may include intangibles such as health and safety culture, social norms and group dynamics, the history of interactions about a particular issue, and other information that is unlikely to be reported and recorded, such as which procedures may be ineffective or poorly understood, which equipment commonly requires workarounds, etc.

4.5. Where should the workforce be involved?

When planning for workforce involvement, consideration should be given to where the involvement should take place – that is, whether the involvement should occur at the facility or at an off-site location. The nature of the decision should provide some guidance in this matter. For lower level decisions which are unlikely to require a significant amount of time, it may be appropriate for involvement to occur at the facility. Similarly, if the decision can be addressed during regular engagement activities, then it is unlikely to require any off-site involvement.

When a decision requires involvement from a number of different parties or a significant investment of time, it may be more beneficial to relocate the activity to an off-site location. For example, workforce involvement in HAZID and HAZOP workshops is likely to be more effective when conducted at an off-site location. Similarly, involvement in the development of other aspects of a safety case may require a significant and dedicated commitment of time and attention. If such involvement is attempted on the facility there is a risk that the activity will be regularly interrupted and distracted with day-to-day requirements, which is likely to adversely affect the quality of input, provided by all parties, including members of the workforce/HSRs.

Conversely, workforce involvement in procedure development or modification may be more effective when conducted at the facility. Immersion in the working environment can assist members of the workforce/HSRs in recognising the practical limitations of procedures, resulting in better quality feedback. However, such facility-based involvement will only be effective if sufficient dedicated time is allowed and the activity is suitably prioritised.

4.6. How should the workforce be involved?

The processes by which workforce involvement occur should be appropriate to the history and culture of the organisation if they are to be effective. Depending on the nature of the relationship between the operator and the workforce, involvement may range from an informal process of regular conversation and discussion, through to a formal process of meetings, minutes, formal communications and official dissemination of information, or varying combinations of these.

Irrespective of the processes by which workforce involvement occurs, there are some common elements, described below, that should be present to ensure that involvement is effective.

4.6.1. Communication

Communication is universally understood to be critical to organisational effectiveness and improved health and safety performance. It also poses a significant challenge area for most organisations. Formal communication channels may be developed to facilitate dissemination of information, with varying degrees of success. Often such formal channels represent one-way communication only, typically from the top down, with information being subjected to multiple layers of filtration and interpretation before it reaches the workforce. This can result in dilution or misrepresentation of the intent and detail of the information, and can facilitate feelings of indifference or cynicism at the front line. These risks can be partially mitigated through the use of direct and two-way communication strategies, including the following:

- during site visits from senior leaders, time should be dedicated to workforce interactions. This should not be limited to group meetings, rather these interactions should occur at the work site and preferably unaccompanied by facility management. This will provide the workforce with an opportunity to voice concerns that they may not feel comfortable raising in front of their supervisors or other line management. This can also assist senior leaders in understanding problems or challenges experienced by the workforce that may not be explained effectively through regular reporting tools and processes
- senior leaders should ensure that they also meet with HSRs and / or health and safety committees during site visits
- safety meetings at the facility should engage the workforce in active, two-way discussions about relevant issues, including suggested actions and improvements for identified issues
- regular structured meetings should be held between facility management and HSRs to discuss specific work group concerns, develop solutions, and track actions
- similarly, meetings should be held between facility management and the health and safety committee, where established, to discuss issues relevant across the workforce and to develop and progress improvement actions
- meetings with HSRs should follow a pre-determined agenda, with nominated roles for chair, minuting, and timekeeping.
- HSRs and health and safety committee members should proactively engage in communication with other members of the workforce to ensure that they are providing accurate and relevant representation during meetings with management
- employee surveys (including health and safety culture surveys) can provide a useful mechanism for initiating two-way communication and involving a large proportion of the workforce. Care should be

taken when constructing surveys, particularly in relation to question format, to reduce ambiguities in potential responses. Note also that the use of a survey implies intent to act on the survey results. Failure to act on the results can damage operator-workforce relationship.

4.6.2. Sharing information

Wherever reasonably practicable, information about matters likely to affect worker health and safety should be provided to the workforce for review and comment prior to decisions being made. The workforce should be made aware of the proposed decision and advised of what information is available to them, where it is located, and how they can participate in the decision.

Provision of information should take into account language, literacy and numeracy factors. Where these factors are likely to pose a challenge, alternative arrangements should be made, such as engaging HSRs in a more proactive manner, and communicating the information in a variety of ways (e.g. documents, diagrams, emails, presentations, conversations, videos, etc.). Information relevant to health and safety decisions may include:

- policies and procedures
- technical guidance about hazards, risks and controls
- hazard reports and risk assessments
- proposed changes to the facility, processes and procedures, plant, substances, etc.
- data about incidents, injuries, and illnesses (internal and industry data)
- safety alerts and bulletins (internal and external).

4.6.3. Providing reasonable opportunities to express views and contribute

Once information has been provided, sufficient time and resources must be allowed for the workforce to understand, consider, and respond to the information. This may include:

- allocating time during work hours for review and discussion
- discussing the issue as an agenda item during workplace meetings
- allowing time for HSR's to engage with their designated work groups
- providing a variety of feedback mechanisms that are easily accessible.

4.6.4. Taking views into account

As mentioned above, initiating workforce involvement and then failing to act on the information received from the workforce can have a significantly detrimental effect on the relationship between the operator and the workforce. To avoid such negative outcomes, workforce feedback should be genuinely considered during the decision-making process.

Decisions may not always reflect the feedback received from the workforce, however decision-makers should be able to demonstrate and document what was considered, and the justification for inclusion or exclusion of workforce feedback.

4.6.5. Advising outcomes of involvement

The workforce should be promptly advised of the outcomes of their involvement in the decision-making process, including details of the final decision and associated expectations or requirements. To improve transparency, it may be beneficial to provide reasons why certain feedback is not represented in the final decision, and to provide interested parties with further information supporting the reasons for the decision.

4.6.6. Documenting involvement

Evidence of workforce involvement is a legislative requirement and is specified in [section 3](#) of this guidance note. However, beyond legislated requirements it can be beneficial to keep records of involvement. These can help to minimise negative perceptions amongst the workforce pertaining to decision-making and reduce the likelihood of disagreements or disputes.

Records need not be complex. Critical information to be included within the record should include:

- who was involved
- details of the issue
- options that were considered
- the final decision
- associated action plans.

4.6.7. Resolving disagreements

Workforce involvement may not always result in agreement, however this should be one of the objectives. Agreement will improve the levels of support and engagement from the workforce in implementing and complying with the decision. In the event that agreement cannot be achieved, procedures should be in place for settling disagreements (including disagreements around the involvement itself), and these should be followed.

4.7. Key success factors

4.7.1. Commitment to effective involvement

Commitment from management

Genuine management commitment is critical to the success of any organisational activity, and workforce involvement is no different. If workforce involvement is sought for the purposes of 'lip service' only, then it is unlikely to be successful, and may instead foster feelings of resentment, cynicism, and mistrust towards management. Workforce involvement does not diminish the management's authority; indeed effective involvement can enhance the impact of this authority by generating personal buy-in and ownership.

Commitment from the workforce

Where the workforce perceives genuine commitment to workforce involvement from management at all levels, they will be more likely to engage in the process. Workforce commitment to involvement is just as important as management commitment, because the process of workforce involvement requires a significant investment of time and effort from the workforce. Genuine involvement offers significant

benefits to the workforce, resulting in decisions and outcomes that are more likely to be relevant, appropriate, and useful to their work.

4.7.2. Competence

Involving the workforce requires certain skills and competencies if it is to be done effectively. Managers and leaders wishing to involve the workforce, and HSRs and OHS committee members who may be acting on behalf of the workforce, should be provided with training and coaching in engagement skills and techniques, including:

- how to deliver effective and engaging presentations
- making information user-friendly
- common barriers to communication
- negotiation and conflict resolution
- running meetings
- group facilitation
- general interpersonal communication
- effective use of formal and informal communication channels
- communicating feedback and dealing with negative responses.

In addition to the general training identified above, all HSRs must undertake NOPSEMA accredited training relating to OHS, as required by clause 30 of schedule 3 to the OPGGS Act.

To improve the effectiveness of workforce involvement in activities such as risk management and incident investigation consideration should be given to the provision of appropriate training aligned with the tools and techniques employed by the operator.

4.7.3. Cooperation

Successful workforce involvement is ultimately dependent on the willingness of all parties to cooperate with each other. This includes the willingness of both operators and members of the workforce to compromise, and the ability to modify their own opinions or positions in light of new information. Workforce involvement may also require various parties to take on actions or additional responsibilities during the involvement process or after feedback is received.

The establishment of teams may be required for the resolution of more complex issues and actions. Such collaborative activities are more likely to be successful if all parties have a genuine commitment to cooperation as a means of achieving the desired improvements in health and safety outcomes. This may require putting aside pride, politics and personal agendas for the sake of the higher order goal.

5. References, Acknowledgments & Notes

5.1. Legislation

- *Offshore Petroleum and Greenhouse Gas Storage Act 2006*
- Offshore Petroleum and Greenhouse Gas (Safety) Regulations 2024

Note: All regulatory references contained within this Information Paper are from the Commonwealth *Offshore Petroleum and Greenhouse Gas Storage Act 2006* and the associated Commonwealth regulations. For facilities located in designated coastal waters, please refer to the relevant State or Northern Territory *Petroleum (Submerged Lands) Act 1982* and the associated regulations.

5.2. Publications

- HSE UK – “Involving your workforce in health and safety”, December 2015, ISBN 978-07176-6227-2.
- HSE UK Information Leaflet INDG421 – “*Play your part!* How offshore workers can help improve health and safety”.
- Safe Work Australia – *Model Code of Practice: Work health and safety consultation, cooperation and coordination*, ISBN 978-0-642-33299-8.

5.3. NOPSEMA publications

- N-04300-GN0060 – The Safety Case in Context: An Overview of the Safety Case Regime
- N-04300-GN0087 - Safety Case Lifecycle Management
- N-04300-GN0106 - Safety Case Content and Level of Detail
- N-04300-GN0107 – Hazard Identification
- N-04300-GN0165 - Risk Assessment
- N-04300-GN0166 - ALARP
- N-04300-GN0271 - Control Measures and Performance Standards
- N-04300-GN1051 - Supporting Safety Studies
- N-04300-GN1053 - Emergency Planning
- N-04300-GN1668 - Safety Case GN Cross Reference
- N-04300-GN1733 - Vessel facilities subject to external hydrocarbon hazards
- N-04300-GN1818 - Operational Risk Assessment
- N-09000-GN1783 – Workplace Arrangements