

Independent Taskforce on Workplace Health and Safety

FarmSafe submission to the Strategic Review of the Workplace Health and Safety System

Submission from: FarmSafe

Full name: Grant Hadfield

Submission is on behalf of an: Organisation

Region: Manawatu-Wanganui (National Organisation)

Respondent category: Manager

What type of industry do you manage, own a business in, or work in: Agriculture

Size of business that you own/manage or work for: 10-19 employees

Gender: Male

Age: 55-64

Ethnicity: European

Contact details:

Phone:

Email:

I consent to my submission being placed on the Independent Taskforce on Workplace Health and Safety website.

Who gets hurt, killed or suffers from ill-health or disease as a result of work?

1. What do you think is driving the differences in health and safety outcomes for different demographic groups?

FarmSafe operates solely in rural areas. Rural health and safety outcomes are influenced by a wide range of factors:

- hours of work/time of day
- isolation
- fatigue

- working alone
 - weather conditions
 - statistics show that age is also an important factor, especially young males aged 18-24 and older workers operating under management stress appear to be at higher risk
 - when accident and injury strikes in a small and medium-sized business, family associated with the business come under huge stress.
2. What changes are needed to the workplace health and safety framework to improve outcomes for demographic groups with higher than average rates of injury and illness?

The rural workplace is dominated by small businesses, including many owner/operators. Behaviour change for all demographic groups is a major cultural aspect to overcome and compliance can influence that. Promoting awareness of the importance of health and safety to business resilience is an important first step in behaviour change. Skills training is essential if we are to reduce injuries and deaths. Technical innovations to minimise and reduce hazards are also important interventions.

Regulatory framework

3. What do you think the challenges are with the current health and safety regulatory framework?

The complexity of issues in small and medium-sized enterprises where health and safety doesn't have specialist support is problematic.

4. How do you think the health and safety regulatory framework could be improved?

Two interventions we would recommend for farming are:

- making licensing of drivers compulsory for farm quad bikes and tractors using a competency-based approach (see further comments, no. 31)
- stronger direction regarding engineering solutions for quad bikes, including rollover protection devices, speed limiting keys and throttle locks, which have been shown to influence safety outcomes (see further comments, no. 31).

FarmSafe notes that:

- a Coronial inquest into quad bike safety will be held in early to mid-2013. FarmSafe supports the Coronial inquest and looks forward to the findings.
- Workplace Australia is releasing a report on 14 November 2012 which will include a summary of submissions/recommendations on quad bike safety for the Australian Government to consider. It is likely that the submissions/recommendations will be a combination of legislative changes for manufacturers to fit crush protection devices, and training packages. There is an opportunity for New Zealand to leverage and align our quad bike legislative framework and training regime with the recommendations adopted by the Australian Government arising from the Workplace Australia report.

Regulators' roles and responsibilities

5. How effective are the regulators in influencing workplace health and safety outcomes?

Regulatory compliance and behaviour/culture change go hand-in-hand. Strengthening the relationship between those involved in the regulatory function and those involved in advisory/training activities can only be positive. More visibility by regulators in and around the farm workplace in an advisory capacity is essential for this to happen.

6. How could the regulators' roles and responsibilities be changed to improve their effectiveness in influencing workplace health and safety outcomes?

In our experience, regulators have good industry knowledge and help small and medium-sized enterprises to implement better systems. FarmSafe works closely with MBIE - Labour and ACC officials.

New Zealand's changing workforce and work arrangements

7. What impact is New Zealand's changing workforce and work arrangements having on health and safety outcomes?

There are major challenges with international labour on dairy farms, especially in relation to language barriers and access to training.

8. What changes to the health and safety framework, if any, are needed as a result of the changing workforce and work arrangements?

A review of training for international labour is required.

Worker participation and engagement

9. How effective do you think worker participation is in improving workplace health and safety in New Zealand?

It is a critical factor. Creating a culture of health and safety involves everyone in a business. It must be led and supported by management behaviour. Management training to provide the systems and communication skills to achieve this is an important consideration. Health and safety needs to be integral to achieving optimal productivity in the workplace and NOT promoted as a compliance matter.

10. What improvements can be made to worker participation in workplace health and safety so as to get better workplace health and safety outcomes?

Having farm safety plans on all farms is critical, with regular discussions and involvement of staff in hazard identification and interventions. This means all staff involved with developing and implementing a plan will have an understanding of what hazards are and what controls are required to manage those hazards. Training underpins this. All staff must to be properly trained

– and, ideally, certified - for the activities they are undertaking, particularly where dangerous machinery is involved.

Leadership and governance

11. To what extent do directors and other senior leaders provide effective leadership and governance of workplace health and safety?

In our experience, in most organisations, governance and leadership responsibility for workplace health and safety is delegated to managers. Unless there is strong reporting at Board level, the topic gets lost at governance level. In small and medium-sized enterprises, the owner/manager fulfils all roles.

12. What improvements can be made to directors' and other leaders' participation in workplace health and safety, so as to get better workplace health and safety outcomes?

In larger businesses, hold directors more accountable through legislation. In small and medium-sized enterprises, more accountability for managers to ensure skills development in staff would help.

Capacity and capability of the workplace health and safety system

13. To what extent do firms have the capacity and capability to effectively manage workplace health and safety issues (including through accessing external resources)?

This is a major challenge for small and medium-sized enterprises, particularly those with higher levels of risk. Small and medium-sized enterprises are generally time poor and don't employ specialist health and safety staff.

14. What options are there for improving firm level capacity and capability to deliver better health and safety outcomes?

Collectively, we need to find ways to get small businesses talking about health and safety and taking ownership of solutions as an integral part of business planning. We need to provide greater incentives for good health and safety outcomes resulting from good planning and culture change.

Incentives

15. How effective are existing financial and non-financial incentives in improving workplace health and safety outcomes?

The ACC Workplace Safety Management Practices Programme is too complicated for small businesses. Small and medium-sized enterprises need an effective, but simple, solution. The ACC Workplace safety discount for agriculture goes some way towards providing this.

16. How could incentives be better used to improve workplace health and safety outcomes?

Well structured and worthwhile incentives will encourage behaviour change. More work is needed in this area by regulators. Better reporting (and promotion) of statistics may also help to influence behaviour change.

Influencing health and safety outcomes beyond one's own workplace

17. How successful are government, industry, corporate or other potentially influential bodies in influencing health and safety outcomes beyond their own workplaces (for example, through influencing their suppliers, counterparts and competitors)?

In the rural sector this is poorly done and there is opportunity for significant improvement, for example, learning from corporate models and industry bodies and sharing information with small and medium-sized enterprises would be a good start. Fonterra has a highly developed system, as do Landcorp. Consideration needs to be given to how these systems could be better leveraged into the sector.

18. What could be done to get government, industry, corporate or other potentially influential bodies to exert greater influence on improving workplace health and safety outcomes beyond their own workplaces?

Industries, for example, DairyNZ and Beef and Lamb, need to take a lead role in health and safety messaging.

Major hazards

19. How strong is New Zealand's current approach to regulating major hazards?

- FarmSafe is not qualified to comment

20. What improvements to the regulation of major hazards would lead to better health and safety outcomes?

- FarmSafe is not qualified to comment

Health and hazardous substances

21. What are the most significant challenges to managing occupational health risks and exposure to hazardous substances?

The confusion between GrowSafe and Approved Handler certification is an ongoing issue for our sector. Currently there are mixed messages, which are resulting in many farmers not engaging in appropriate programmes.

22. What changes could be made to the existing health and safety framework to reduce the harm caused by occupational disease and ill-health?

- FarmSafe is not qualified to comment.

Small to medium-sized enterprises

23. What workplace health and safety challenges are specific to the self-employed and small to medium-sized enterprises?

The following factors are typical of the self-employed and small to medium-sized enterprises in the rural sector:

- time poor
- no specialisation at task or management level
- often working in isolation
- often long working hours
- weather and the environment influence performance and behaviour
- the range and type of machinery in use
- the stress of volatility of product prices and high gearing adds to the risk.

24. What improvements could be made to the workplace health and safety framework and its implementation to ensure that it's effective for self-employed and small-to-medium sized enterprises?

There is possibly an opportunity to review/improve incentives to encourage greater engagement.

Measurement and data

25. To what extent are New Zealand's workplace injury and occupational disease data collection mechanisms conducive to robust monitoring, investigation and comparative analysis?

The data captured at doctors' offices, medical centres and hospitals is largely medically focused. There is a need to capture more information on the factors influencing the events leading to injury or illness and use that information to improve systems and knowledge.

26. What opportunities are there for improving data collection, integration and reporting?

There is an opportunity for better reporting of data at industry level and for the publication of key indicators and measures at the workplace level.

Our national culture and societal expectations

27. Do you think New Zealand culture influences our workplace health and safety outcomes?

Yes. Culture change, driven by behaviour change, needs to happen in the rural sector.

28. What might we do to improve our culture relating to workplace health and safety?

We can't rely on commonsense to keep people alive. We need:

- more leadership, communication and key messages on health and safety from industry leaders
- small and medium-sized businesses to have more opportunity and access to workplace training and awareness of health and safety matters
- to identify opportunities for greater visibility by regulators in an advisory/education role.

Other factors

29. Are there any other factors (not already covered) that influence workplace health and safety outcomes in New Zealand?

We question whether the decision to remove Health and Safety from Levels 2 and 3 subsidised vocational training programmes is the right decision, particularly given the predominance of small and medium-sized enterprises within the New Zealand business framework.

Health and safety needs to be embedded in all workplace training, with a focus on changing workplace culture. It's not about compliance; it's about productive work behaviours. If we change workplace safety, we will influence society culture and that is good for everybody.

30. Do you have any other suggestions for how to improve workplace health and safety outcomes in New Zealand?

See below.

Other comments

31. Are there any other comments that you would like to make?

Thank you for the opportunity to provide this submission to the Independent Taskforce on Workplace Health and Safety consultation.

15 people in the rural sector lost their lives in workplace accidents in 2011. Every year, between 120 and 150 rural sector workers are seriously injured. In the years 2008-2011, 25 rural people on average committed suicide each year. The cost of these shocking statistics is too high – for rural families, communities and workplaces, and for the New Zealand economy.

As the leading provider of health and safety training and education for New Zealand's primary industries, FarmSafe is focused on driving down these fatality and serious injury rates. Over the 10 years of our operation we have delivered health and safety training to around 50,000 people in the pastoral and horticultural sectors. Our focus is on building relationships, networks and partnerships with rural communities. Our courses are developed and delivered by the rural community for the rural community. Our trainers and facilitators are rural people with rural experience and a rural outlook. Turning around these statistics is about taking a leadership role in bringing about behaviour change to promote a workplace culture of health and safety. That means instilling a mindset that embraces health and safety every second of the working day.

Our view is simple. Messaging around workplace health and safety needs to be positioned as a productivity matter not as compliance issue. Compliance and better incentives will help, but good health and safety is at the core of a productive workforce. Training to influence attitudes, beliefs and skills is fundamental to sector productivity.

Our vision and focus remain constant in all FarmSafe's activities – keeping rural communities safe. We have done this by developing a foundation of health and safety programmes and responding to specific needs by developing and delivering additional programmes as necessary. We have taken the opportunity in this section of our submission to highlight two areas – rural suicide and farm quad bike safety - that we believe require further development and support to increase reach and bring about change over and above our 'business as usual' health and safety training activities.

This additional comment includes:

- Background on FarmSafe
- Towards developing programmes to address rural suicide
- Quad bike safety

About FarmSafe

FarmSafe is owned and managed by a consortium of three education providers: Primary ITO, Agriculture New Zealand Limited and Telford, a division of Lincoln University. FarmSafe's vision to make the rural community a safer place and our mission is to provide quality training and services to make rural people safer in the workplace. We provide hands-on training for all skill levels and tailor farm safety advice for individual farm and horticulture businesses. Our training is NZQA-certified. Our workshops cover chainsaw, tractor, ATV, 4-wheel drive, motorbike, powered orchard machinery, tree felling, pruning, agrichemical skills and personal health. We are focused on promoting a health and safety culture of continuous improvement in all rural workplaces.

Towards developing programmes to address rural suicide

FarmSafe is exploring a wider strategy to include a rural community mental health programme in our training offering. We believe that tailoring mental health programmes to the rural community is critical in order to reduce the alarming suicide statistics.

In August 2011, Chief Coroner Judge Neil MacLean released provisional national suicide statistics, noting that: *"The suicide toll is a really concerning commentary on our society and I believe that anything we can do to aid more accurate information can only be for the better...the statistics show that what we have done in the past is not bringing the toll down, so we must look for new solutions..."* Coronial data records a triple-fold increase in rural suicides in the years 2008-2011, averaging 25 rural suicide deaths per year.

FarmSafe has undertaken an initial review as a basis for further work including developing mental health education training strategies.¹ The review shows that mental health education training and

¹ Mental Health in the Rural Sector: A review, Walker, J F, Agricultural Services Limited

strategies strengthen rural communities' resilience, develop mental health literacy and lessen the stigma associated with mental health issues and depression.

In the New Zealand context, the review highlighted a disconnect between providers of mental health care and the lack of cohesive, collaborative policy, particularly in the agricultural sector, to develop a nationwide strategy around rural mental health. In part, the lack of strategy is related to a stigma surrounding mental health and because the agriculture research, policy and funding focus has been on increasing agricultural production.

There are three rural demographic groups that could benefit from the development of mental health educational programmes: young rural men and women, gatekeepers and farming families.

A copy of the research paper is available at: www.Farmsafe.co.nz

Quad bike safety

There were 49 quad bike deaths in New Zealand between 2000 and 2011 and 35 riders fall off their bikes every day. Prevention of quad bike fatalities and accidents is twofold – **safety by education and safety by design**, by looking at engineering solutions for farm quad bikes, including rollover protection devices, speed limiting keys and throttle locks, which have been shown to influence safety outcomes

The issue of quad bike safety is at the forefront of our rural communities. In addition to delivering safety training, FarmSafe has established a quad bike licence framework for experienced and inexperienced riders, similar to the car licence process. It is a developing initiative that needs support to increase its reach throughout New Zealand. Better safety training can and will make a difference.

The quad bike farm licence is gained through a practical training package that covers safe quad bike riding practices as well as teaching participants to identify, minimise and isolate potential bike riding hazards and make safe riding decisions. Applicants are required to undertake quad bike training and hold unit standards relevant to the safe use of quad bikes. Applicants must complete an attestation that they have ridden for 3 months and 30 hours injury-free and successfully pass a multi-choice assessment based on their knowledge of the MBIE - Labour Guidelines for the safe use of quad bikes.

Work is currently underway to extend this concept to tractors.

Modifying quad bike technology and design

FarmSafe believes that a core responsibility for safer quad bikes rests with designers and manufacturers. Better design could improve stability and ensure protection in the event of rollover. Our Australian neighbours face similar shocking quad bike fatality and serious injury statistics and are also looking for answers. So far, this has proven a much vexed issue as raised by the Director of the Australian Centre for Agricultural Health and Safety at University of Sydney, Tony Lower, in an article titled *Crush Protection – raising the bar* in National Safety magazine. Tony Lower concludes that more research is needed on devices to prevent rollover deaths, but based on precautionary principles and the current state of evidence in the area, if people are going to use a quad bike, a suitably tested crush protection device should be fitted to the vehicle.

As noted above, there is a range of technology solutions to influence quad bike safety outcomes that could be considered. Should progress be made in this area with manufacturers, consideration would also need to be given to retro-fitting crush protection devices to existing quad bikes.

FarmSafe notes that:

- a Coronial inquest into quad bike safety will be held in early to mid-2013. FarmSafe supports the Coronial inquest and looks forward to the findings.
- Workplace Australia is releasing a report on 14 November 2012 which will include a summary of submissions/recommendations on quad bike safety for the Australian Government to consider. It is likely that the submissions/recommendations will be a combination of legislative changes for manufacturers to fit crush protection devices, and training packages. There is an opportunity for New Zealand to leverage and align our quad bike legislative framework and training regime with the recommendations adopted by the Australian Government arising from the Workplace Australia report.