

27 August 2025

ATTN: Marie Boland  
Chief Executive Officer  
Safe Work Australia

## Safe Work Australia Best Practice Review of Model Work Health & Safety Laws & Regulations

Dear Ms Boland,

The Veterans, Emergency Services & Police Industry Institute of Australia (VESPIIA) endorses the submission of the Women in Defence Association (WiDA) and joins their call for a comprehensive review of Work Health and Safety laws. VESPIIA is the national professional body for those who support Australia's veterans, emergency services, and police communities. Our members include ex-service organisations, emergency service providers, staff, volunteers, researchers, and allied professionals. We advocate for those who sustain the support system on which service personnel and their families rely.

### Endorsement of WiDA's Position

We acknowledge the leadership of WiDA in pressing for reform and support their submission in full. In particular, we emphasise the importance of:

- Explicitly recognising gender-based violence, sexual harassment and bullying as workplace hazards;
- Placing a clear duty on employers to prevent harm, not rely on complaints;
- Removing Defence exemptions that undermine WHS protections; and
- Strengthening recognition of psychosocial risks.

The need for these reforms is consistent with the findings of the Respect@Work National Inquiry into Sexual Harassment (2020), which recommended amendments to WHS legislation to treat sexual harassment as a workplace health and safety hazard.<sup>1</sup>

### Royal Commission Findings

The Royal Commission into Defence and Veteran Suicide final report (September 2024) makes plain that workplace cultures which tolerate harassment and violence are linked directly to heightened suicide risk. Volumes 2 and 3 document the prevalence and impact of military sexual violence, harassment, and unacceptable behaviour. Survivors described these experiences as "devastating" and "soul-destroying", with many noting the harm endured long after leaving Defence.<sup>23</sup>

The Commission also highlighted transition to civilian life as a period of acute risk. Trauma from sexual violence and harassment often resurfaces during transition, compounding mental health vulnerabilities and exposing individuals to further harm in civilian workplaces.<sup>4</sup> Without clear WHS obligations to prevent and address such hazards, the risk of poor outcomes – including suicide – remains unacceptably high.

### Relevance to First Responders and Police

While the Royal Commission examined Defence, the same issues are evident in emergency services and policing. Research by the Australian Institute of Health and Welfare shows that emergency service workers experience higher rates of PTSD, depression, and suicide than the general population.<sup>5</sup> The Australasian Fire and Emergency Services

<sup>1</sup> Australian Human Rights Commission, Respect@Work: National Inquiry into Sexual Harassment in Australian Workplaces (2020): <https://humanrights.gov.au/our-work/sex-discrimination/publications/respectwork-sexual-harassment-national-inquiry-report-2020>

<sup>2</sup> Royal Commission into Defence and Veteran Suicide, Final Report, September 2024: <https://defenceveteransuicide.royalcommission.gov.au/publications/final-report>

<sup>3</sup> Royal Commission into Defence and Veteran Suicide, Final Report – Volume 3: Military sexual violence, unacceptable behaviour and military justice, September 2024: <https://defenceveteransuicide.royalcommission.gov.au/publications/final-report-volume-3>

<sup>4</sup> Royal Commission into Defence and Veteran Suicide, Easy Read Guide to the Final Report: <https://defenceveteransuicide.royalcommission.gov.au/publications/easy-read-guide-final-report>

<sup>5</sup> Australian Institute of Health and Welfare (AIHW), Mental health of emergency service workers (2021): <https://www.aihw.gov.au/reports/veterans/emergency-service-workers-mental-health>

Authorities Council has also acknowledged entrenched issues of bullying, harassment, and gender exclusion in frontline services.<sup>6</sup> These harms carry over into post-service life, affecting families and communities.

## Psychosocial Hazards

Psychosocial hazards must be elevated to the same level as physical hazards in WHS frameworks. For the workforce that VESPIIA represents, this includes:

- Exposure to trauma and vicarious trauma through frontline support work;
- Moral injury, where personnel feel betrayed by systems that fail to uphold justice;
- Burnout and cumulative stress, exacerbated by chronic under-resourcing;
- Isolation and lack of peer support, particularly in rural and remote postings.

Safe Work Australia's own Model Code of Practice recognises these risks, but implementation remains inconsistent.<sup>7</sup> The Productivity Commission has also shown that mental ill-health and unsafe psychosocial environments cost Australia billions annually in lost productivity and social harm.<sup>8</sup>

## Volunteer-Heavy Workforces

Ex-service organisations and many emergency service units rely heavily on volunteers. Current WHS laws offer limited clarity on how obligations apply in these settings, and small organisations often lack resources to comply. Volunteers face the same risks – harassment, bullying, and trauma – yet protections are inconsistent. Reform must include practical guidance and compliance tools tailored for volunteer-heavy organisations. Without this, a significant portion of the workforce will remain unprotected.

## Implementation Needs

Reform must not only change the law but also ensure:

- Accessible compliance resources for small not-for-profits and volunteer-led organisations;
- Consistent national standards, avoiding state-by-state inconsistencies;
- Active monitoring and enforcement of psychosocial hazard obligations; and
- Consultation with sector bodies such as VESPIIA to ensure reforms reflect lived realities.

## Conclusion

We strongly support WiDA's recommendations and emphasise the additional points outlined above. The Royal Commission, alongside other national reviews, has already shown the cost of inaction. Survivors of sexual violence and harassment cannot continue to face transition into civilian life without adequate protection. Volunteers, staff, and families must not be left behind in reform.

VESPIIA urges Safe Work Australia to act without delay and ensure that WHS laws provide comprehensive, consistent, and enforceable protections across Defence, emergency services, police, and the organisations that support them.

Yours in service,



Shannon Hennessy  
Chief Executive Officer  
Veterans, Emergency Services & Police Industry Institute of Australia (VESPIIA)

<sup>6</sup> Australasian Fire and Emergency Services Authorities Council (AFAC), Women in Fire and Emergency Services Strategy (2022): <https://www.afac.com.au/initiative/women-in-fire-and-emergency-services>

<sup>7</sup> Safe Work Australia, Model Code of Practice: Managing Psychosocial Hazards at Work (2022): <https://www.safeworkaustralia.gov.au/doc/model-code-practice-managing-psychosocial-hazards-work>

<sup>8</sup> Productivity Commission, Mental Health Inquiry Report (2020): <https://www.pc.gov.au/inquiries/completed/mental-health/report>

