



SUBMISSION

OFSC Discussion Paper – Positive Performance Paper

27 August 2025



1. Introduction

Master Builders ACT (MBA ACT), as a member body with a high percentage of members OFSC accredited, welcomes the opportunity to contribute to the Office of the Federal Safety Commissioner's (OFSC) consultation on Positive Performance Indicators (PPIs). This discussion paper marks a significant shift in how safety performance is assessed under the WHS Accreditation Scheme—moving beyond traditional lagging indicators like injury frequency rates, toward proactive, preventative measures that better reflect safety culture and operational maturity.

2. Our Position

MBA ACT supports the proposal for OFSC to use PPIs to assess accredited builders' safety operations and compliance. IT is our position that PPIs offer a proactive lens into safety culture and operational behaviours. They help identify risks before incidents occur and support continuous improvement, especially for companies committed to maturing their WHS systems.

3. Feedback on the OFSC's definition of PPIs

The proposed definition is appropriate and aligns with Safe Work Australia's terminology. However, we recommend clearer differentiation between **predictive indicators** (e.g. safety climate) and **preventative actions** (e.g. toolbox talks), to ensure consistent interpretation across the sector.

4. Most important PPIs for assessing safety performance:

- Safety orientation and training: Sets the foundation for safe work practices.
- Senior management commitment: Drives accountability and culture.
- Hazard analysis and corrective actions: Directly reduces risk exposure.
- Worker involvement: Encourages ownership and improves reporting.

Additional PPIs we recommend:

- Fatigue and mental health monitoring: Increasingly relevant in high-pressure environments.
- Digital WHS system usage: Reflects maturity and integration of safety into operations.

5. Recommended number of PPIs for OFSC shortlist:

A shortlist of **5–8 indicators** would be manageable and meaningful, allowing benchmarking without overwhelming companies.

Subcriteria for company-selected PPIs:

- Relevance to company risk profile
- Defined performance objectives
- Evidence of measurement and analysis
- Demonstrated improvement actions
- Integration into WHSMS and reporting cycles

6. Preferred data collection methods:

- Audit-based collection: Low burden and integrates with existing processes.
- Biannual reporting: Suitable for consistent tracking.
- Annual census: Useful for broader insights, especially if voluntary.
- Employee surveys: Valuable but should be optional or supported with templates.

Most acceptable regulatory burden:

Audit integration and census inclusion are least disruptive. Surveys and standalone reporting may require additional support and resources, especially for smaller builders.

7. Pilot program implementation suggestions:

- Select a diverse group of volunteer companies (size, region, project type)
- Use existing audit tools with added PPI checklists
- Compare PPI data with incident trends over 12–18 months
- Include feedback loops for participating companies

8. Effective implementation for builders:

- Allow flexibility in selecting PPIs relevant to their operations
- Provide benchmarking tools and guidance
- Integrate PPI tracking into existing WHS systems and audits

Regulatory impacts and cost considerations:

- Potential increase in reporting workload
- Need for training and system updates
- Survey administration and data management costs
- Support mechanisms (e.g. templates, training) should be provided

Validity of cross-validating PPIs against incident data should be complemented with qualitative assessments and trend analysis to capture cultural and behavioural shifts.

10. Conclusion

MBA ACT supports the OFSC's move toward integrating Positive Performance Indicators into the OFSC Accreditation Scheme. This shift represents a valuable opportunity to strengthen safety culture, improve risk management, and provide more meaningful insights into safety performance. For successful implementation, PPIs must be clearly defined, scalable across company sizes, and aligned with existing systems to minimise regulatory burden. We encourage a flexible, staged rollout that supports industry engagement and continuous improvement, and we look forward to contributing to a safer, more proactive construction sector.

Anna Neelagama

CEO, Master Builders ACT

Phone: 0448692245

Email: aneelagama@mba.org.au