

SUBMITTED BY:
HEALTH AND SAFETY
EDUCATION FORUM

DATE:
18 MARCH 2026

TO:
THE EDUCATION AND
WORKFORCE COMMITTEE

HEALTH AND SAFETY
EDUCATION FORUM: 2026
HEALTH AND SAFETY
AMENDMENT BILL SUBMISSION

Submission on the Health and Safety at Work Amendment Bill 2026

To: Education and Workforce Select Committee

Re: Health and Safety at Work Amendment Bill 2026 (the Bill)

Submitted by: HS Education Forum

Date: [Insert date]

We wish to appear: Yes

1. Submitter details and standing

1.1 Who we are

The HS Education Forum unites health and safety educators, practitioners, students, and professional bodies to advance high-quality, consistent occupational health and safety (OHS) education in Aotearoa New Zealand.

1.2 Our purpose and why we are submitting

Our purpose is to improve the quality, accessibility, and relevance of OHS education, ensuring health and safety is intentionally integrated into qualification and curriculum design, not treated as an afterthought.

We are submitting because legislation shapes what is taught, assessed, and resourced. Any change in the Bill's approach to health and safety will affect:

- qualification design and skill standards,
- educator and assessor expectations,
- graduate attributes and professional formation,
- and workforce capability over time.

2. Summary of our submission

2.1 Our overall position on the Bill

The HS Education Forum supports amendments to the Health and Safety at Work Act 2015 (HSWA) that reduce fatalities, serious harm, and work-related ill-health, and improve

consistency and clarity for duty holders and workers. However, we are concerned that some aspects of the Bill may be interpreted as limiting health and safety obligations to “critical risks only.” This could weaken workforce capability and prevention efforts across all types of harm, including chronic health, psychosocial, and cumulative harms.

2.2 Why this Bill matters from an education and workforce perspective

HSWA is more than a compliance framework; it sets expectations that inform training, assessment, qualification design, and organisational practice. When legislation changes, education providers, assessors, and industry training systems respond, sometimes rapidly and sometimes inconsistently.

Lasting improvement in health and safety for workers in Aotearoa depends on building workforce competence and professional practice through consistent learning outcomes, qualifications, and training pathways. That makes the skills system (including Industry Skills Boards (ISBs), providers, and industry) an essential part of implementation. The Committee can help by ensuring the Bill and its implementation approach support explicit, assessable expectations for health and safety competence.

2.3 Recommendations (summary)

We recommend the Committee:

1. **Ensure the Bill maintains a “whole-of-harm” approach** so expectations for non-critical but significant harms, including chronic health, psychosocial, and cumulative harms, are not reduced.
2. **Prevent “implicit” safety learning** by ensuring legislative and regulatory settings require explicit, assessable OHS competence across qualifications and industries, rather than relying on informal embedding.
3. **Require an implementation package, including** guidance, exemplars, and educator-ready resources, with sufficient lead-in time for education and industry to align skill standards, learning outcomes, and training delivery.

3. The education and workforce lens: what the Committee should consider

3.1 Health and safety performance is also a capability problem

From the Forum’s perspective, New Zealand’s health and safety outcomes depend on system capability: how consistently expectations are understood, taught, assessed, resourced, and reinforced across sectors and regions. When system signals are unclear, training and assessment become inconsistent, leading to uneven competence.

Training programmes and qualifications often reflect the priorities set by legislation, regulator guidance, and enforcement. If the Bill is seen as focusing mainly on “critical risks,” it may unintentionally encourage:

- narrower learning outcomes,
- reduced attention to wider prevention (including chronic and cumulative harms),
- and “tick-box” compliance training rather than capability building.

The Forum’s mandate is to prevent this shift by promoting intentional, coherent pathways from foundational to advanced study and practice.

4. Submission on the Bill: key issues and recommendations

Issue 1: System signal — avoid narrowing prevention focus

Concern: The Bill’s framing could lead duty holders, workers, educators, and training designers to believe that only “critical risks” matter. This interpretation risks deprioritising significant non-critical harms and weakening prevention capability in daily work. Over time, it could also affect what is taught and assessed in vocational and professional learning. The Bill and/or the explanatory material to make explicit that prioritising critical risks does not reduce the obligation to prevent and manage other material workplace health and safety harms (including chronic and cumulative harms and psychosocial risks), so far as is reasonably practicable.

Reason: This preserves a balanced, whole-of-harm signal for training and assessment and supports coherent curriculum and qualification design across industries.

Issue 2: Education integrity — prevent “implicit embedding” and loss of rigour

Concern: The ISB transition is already at risk of diluting safety content, where safety is “embedded implicitly rather than taught explicitly.” The Bill should not worsen this by creating ambiguity about what must be taught and assessed.

Recommendation 2:

Recommend that the lead agency/regulator publishes educator-ready and employer-ready exemplars that translate the Bill’s expectations into:

- learning outcomes,
- assessment examples,
- and role-based competency statements.

Issue 3: National coherence — the Bill needs an education-and-workforce implementation pathway

Concern: The briefing highlights a lack of coordinated national leadership and fragmented effort. Without an intentional implementation pathway, the Bill risks increasing variation in interpretation throughout industries and regions, which leads to inconsistent training and uneven competence.

Recommendation 3:

Recommend that the Government publishes an implementation package alongside commencement of the amendments, including:

- plain-language guidance for duty holders and workers, aligned to the amended HSWA;
- sector-relevant examples and case studies, including for non-critical but material harms (e.g., chronic health and psychosocial risks);
- educator-ready resources that support consistent teaching and assessment;
- a realistic lead-in period so qualifications, training products, and assessment materials can be updated consistently.

Issue 4: Build a formal bridge to the ISB and skills system

Concern: The ISB can integrate health and safety into workforce development and industry standards, but this requires structured engagement and clear accountability.

Recommendation 4:

Recommend that implementation of the amendments includes a formal mechanism for the lead agency/regulator to work with the relevant ISB(s) so that:

- health and safety competencies are retained and strengthened as skill standards replace unit standards,
- qualification pathways remain coherent from foundational to advanced levels,
- and professional oversight and practitioner input are maintained.

Issue 5: Use evidence to prevent drift in competence requirements during implementation

Context: The Forum is mapping health and safety learning outcomes from existing standards and qualifications into a draft Health & Safety Competency Framework. We consider this evidence-led mapping valuable for maintaining clarity about what should be taught and assessed as the skills system evolves.

Recommendation 5:

Recommend that the implementation programme uses evidence-led competency mapping, including ongoing work in the education and training sector, to ensure key learning outcomes

are retained, made explicit, and not diluted as training products, qualifications, and skill standards are updated to align with the amended HSWA.

5. What success looks like (education and workforce outcomes)

From the HS Education Forum’s perspective, success would mean:

- Clear national expectations that support consistent interpretation and practice across sectors and regions.
- Explicit health and safety competence is visible in qualifications and training (not left to “implicit embedding”).
- Coherent pathways from foundational training through to advanced qualifications, supporting professional identity and recognised practice.
- Stronger inclusion of Te Tiriti o Waitangi and kaupapa Māori approaches in health and safety education, recognising mātauranga Māori contributions to wellbeing and risk management.

6. Clause-level comments (if requested)

If the Committee wishes, we can provide clause-by-clause comments on the Bill once the Committee’s key questions and preferred areas of focus are confirmed (for example, definitions and thresholds used for “critical risk”, and any consequential guidance or transitional settings).

7. Conclusion

The HS Education Forum urges the Committee to view the Bill not only as a legal change but as a system signal that will shape education, training, and workforce capability for years to come. The Bill’s success will depend on its ability to strengthen prevention across all types of harm while supporting explicit, rigorous competence requirements through the skills system.

We welcome the opportunity to appear before the Committee.