Law Compliance Report – July 2023

Welcome to the July 2023 edition of the Law Compliance Report.

In this issue we:

- set out some of the current Bills we are tracking throughout Australia;
- discuss recent legislative changes occurring Nationally and in each State and Territory:
  - Commonwealth
  - Australian Capital Territory
  - New South Wales
  - Northern Territory
  - Queensland
  - South Australia
  - Tasmania
  - Victoria
  - Western Australia
- introduce our Client in the Spotlight: Uniting Vic.Tas; and
- provide an overview of the most recent updates to Comply Online®.

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July 2023 Edition

Some of the legislative changes being tracked

Western Australia

Abortion Legislation Reform Bill 2023 (WA)
Climate Change and Greenhouse Gas Emissions Reduction Bill 2021 (WA)
Guardianship and Administration Amendment (Medical Research) Bill 2023 (WA)
Liquor Control Amendment (Banned Drinkers Register) Bill 2023 (WA)
Retail Trading Hours Amendment Bill 2021 (WA)
Statutes (Repeals and Minor Amendments) Bill 2021 (WA)

Northern Territory

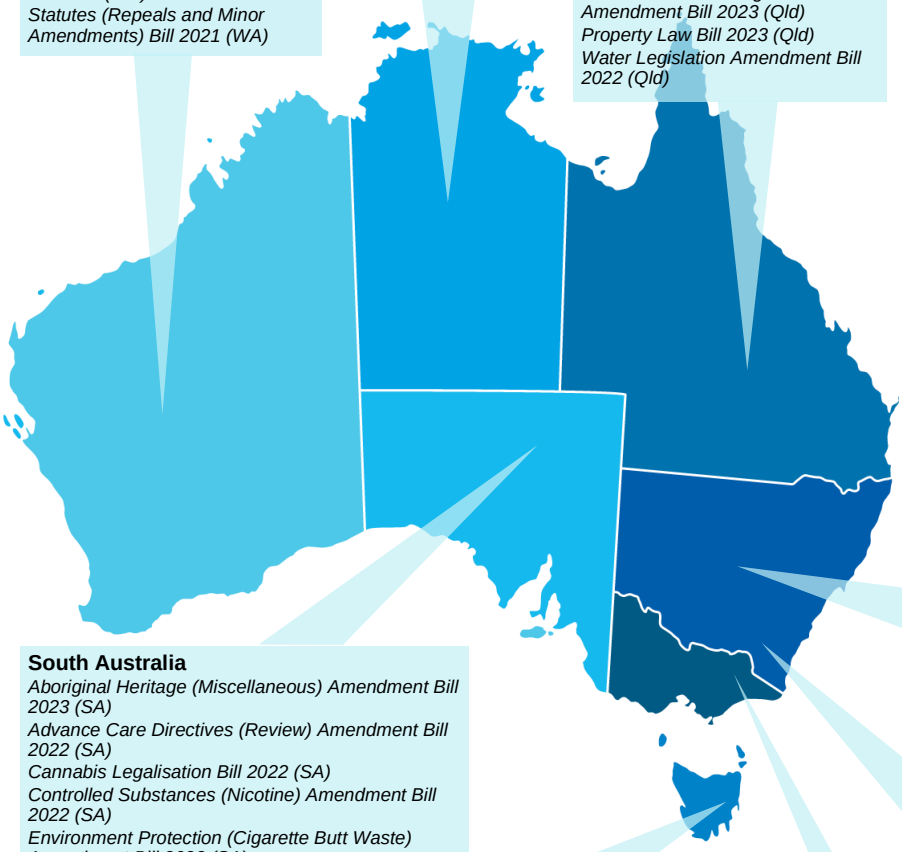
Criminal Justice Legislation Amendment (Sexual Offences) Bill 2023 (NT)
Food Amendment Bill 2023 (NT)
Health Care Decision Making Bill 2023 (NT)
Liquor Legislation Amendment (Offences) Bill 2023 (NT)

Queensland

Criminal Code (Serious Vilification and Hate Crimes) and Other Legislation Amendment Bill 2023 (Qld)
Gas Supply and Other Legislation (Hydrogen Industry Development) Amendment Bill 2023 (Qld)
Health Practitioner Regulation National Law (Surgeons) Amendment Bill 2023 (Qld)
Integrity and Other Legislation Amendment Bill 2023 (Qld)
Justice and Other Legislation Amendment Bill 2023 (Qld)
Property Law Bill 2023 (Qld)
Water Legislation Amendment Bill 2022 (Qld)

Commonwealth

Commonwealth Electoral Amendment (Cleaning up Political Donations) Bill 2023 (Cth)
Crimes and Other Legislation Amendment (Omnibus) Bill 2023 (Cth)
Crimes Legislation Amendment (Combatting Foreign Bribery) Bill 2023 No. (Cth)
Customs Amendment (Banning Goods Produced By Forced Labour) Bill 2022 (Cth)
Customs Legislation Amendment (Controlled Trials and Other Measures) Bill 2022 (Cth)
Environment Protection and Biodiversity Conservation Amendment (Climate Trigger) Bill 2022 [No. 2] (Cth)
Export Control Amendment (Streamlining Administrative Processes) Bill 2022 (Cth)
Fair Work Amendment (Prohibiting COVID-19 Vaccine Discrimination) Bill 2023 (Cth)
Fair Work Amendment (Right to Disconnect) Bill 2023 (Cth)
Family Law Amendment (Information Sharing) Bill 2023 (Cth)
Family Law Amendment Bill 2023 (Cth)
Financial Accountability Regime (Consequential Amendments) Bill 2023 (Cth)
Financial Accountability Regime Bill 2023 (Cth)
Health Insurance Amendment (Prescribed Dental Patients and Other Measures) Bill 2023 (Cth)
Inspector-General of Aged Care Bill 2023 (Cth)
Migration Amendment (Strengthening Employer Compliance) Bill 2023 (Cth)
Nature Repair Market Bill 2023 (Cth)
Public Sector Superannuation Legislation Amendment Bill 2022 (Cth)
Treasury Laws Amendment (Consumer Data Right) Bill 2022 (Cth)
Treasury Laws Amendment (Making Multinationals Pay Their Fair Share—Integrity and Transparency) Bill 2023 (Cth)
Treasury Laws Amendment (2023 Measures No. 3) Bill 2023 (Cth)
Treasury Laws Amendment (Modernising Business Communications) Bill 2022 (Cth)



New South Wales

Anti-Discrimination Amendment (Religious Vilification) Bill 2023 (NSW)
Minerals Legislation Amendment (Offshore Drilling and Associated Infrastructure Prohibition) Bill 2023 (NSW)
Residential Tenancies Amendment (Rent Freeze) Bill 2023 (NSW)

South Australia

Aboriginal Heritage (Miscellaneous) Amendment Bill 2023 (SA)
Advance Care Directives (Review) Amendment Bill 2022 (SA)
Cannabis Legalisation Bill 2022 (SA)
Controlled Substances (Nicotine) Amendment Bill 2022 (SA)
Environment Protection (Cigarette Butt Waste) Amendment Bill 2023 (SA)
Explosives Bill 2023 (SA)
Fair Trading (Lifespan of Electrical Products) Amendment Bill 2022 (SA)
Food (Restrictions on Advertising of Junk Food) Amendment Bill 2022 (SA)
Freedom of Information (Ministerial Diaries) Amendment Bill 2022 (SA)
Gas (Ban on New Connections) Amendment Bill 2022 (SA)
Health Care (Ambulance Response Targets) Amendment Bill 2023 (SA)
Heritage Places (Adelaide Park Lands) Amendment Bill 2022 (SA)
Planning, Development and Infrastructure (Gas Infrastructure) Amendment Bill 2022 (SA)
Public Finance and Audit (Auditor-General Access to Cabinet Submissions) Amendment Bill 2022 (SA)
Statutes Amendment (Animal Welfare Reforms) Bill 2022 (SA)
Statutes Amendment (Personal Mobility Devices) Bill 2022 (SA)
Work Health and Safety (Industrial Manslaughter) Amendment Bill 2022 (SA)

ACT

Abortion Legislation Reform Bill 2023 (WA)
Biosecurity Bill 2023 (ACT)
Corrections Management Amendment Bill 2021 (ACT)
Integrity Commission Amendment Bill 2022 (No 2) (ACT)
Justice (Age of Criminal Responsibility) Legislation Amendment Bill 2023 (ACT)
Justice and Community Safety Legislation Amendment Bill 2023 (ACT)
Modern Slavery Legislation Amendment Bill 2023 (ACT)
Transport Canberra and City Services Legislation Amendment Bill 2022 (ACT)

Tasmania

Guardianship and Administration Amendment Bill 2023 (Tas)
Right to Information Amendment Bill 2021 (Tas)
Residential Building (Miscellaneous Consumer Protection Amendments) Bill 2022 (Tas)
Public Interest Disclosures (Members of Parliament) Bill 2021 (Tas)
Electoral Disclosure and Funding Bill 2022 (Tas)
Right to Information Amendment (Public Protected Areas) Bill 2021 (Tas)
Residential Tenancy (Rental Market Reform) Amendment Bill 2021 (Tas)
Justice Miscellaneous (Removal of Outdated Sex Terminology) Bill 2023 (Tas)
Vehicle and Traffic (Regulatory Reforms) Amendment Bill 2023 (Tas)

Victoria

Children, Youth and Families Amendment (Home Stretch) Bill 2023 (Vic)
Children, Youth and Families Amendment (Raise the Age) Bill 2022 (Vic)
Drugs, Poisons and Controlled Substances Amendment (Authorising Pharmacists) Bill 2023 (Vic)
Energy Legislation Amendment (Energy Safety) Bill 2023
Mental Health and Wellbeing Amendment Bill 2023 (Vic)
Public Health and Wellbeing Amendment (Health Services Performance Transparency and Accountability) Bill 2023 (Vic)
Statute Law Amendment (References to the Sovereign) Bill 2023 (Vic)

If you would like details of these new Bills please contact our team on **1300 862 667**
or visit our website **www.lawcompliance.com.au**

Commonwealth Update

Workplace Gender Equality Amendment (Closing the Gender Pay Gap) Act 2023 (Cth)

On 12 April 2023, the *Workplace Gender Equality Amendment (Closing the Gender Pay Gap) Act 2023* (Cth) (the **Amending Act**) amended the *Workplace Gender Equality Act 2012* (Cth) (the **Act**).

Most notably, the Amending Act has amended the Act to require certain organisations to provide their Workplace Gender Equality Agency gender equality reports to their governing bodies. Importantly, these new changes apply to organisations already required to report to the Workplace Gender Equality Agency.

These changes and other relevant amendments are discussed below.

New requirement to provide gender equality reports to governing bodies

To strengthen accountability of relevant employers to take action to improve gender equality in their workplaces, the Amending Act has amended the Act to introduce additional requirements for relevant employers who are, (in short) non-public sector employers with 100 or more employees as well as registered higher education providers that are employers.

New section 16C of the Act now requires the Chief Executive Officer (**CEO**) (however described) of a relevant employer to provide certain reports (being the executive summary report and the industry benchmark report) provided by the Workplace Gender Equality Agency (**WGEA**), to all members of the relevant employer's governing body.

The **executive summary report** contains a summary of the information contained in a public report prepared by the relevant employer in respect of the reporting period. The **industry benchmark report** compares the information contained in a public report prepared by the relevant employer in respect of the reporting period with the information contained in public reports prepared by similar relevant employers in respect of the reporting period.

Section 16C requires the CEO to ensure that as soon as reasonably practicable after receiving from the WGEA an industry benchmark report for the relevant employer for a reporting period, a copy of that report is given to each member of the organisation's governing body (if any). Furthermore, if at the time of receiving an industry benchmark report, the relevant employer has received an executive summary report for the reporting period but has not yet given it to members of the organisation's governing body, the relevant employer's CEO is required to ensure that copies of *both* reports are given to members of the governing body together.

Importantly, section 19D of the Act provides that where a relevant employer (without reasonable excuse), fails to comply with the Act, the WGEA may name the employer as having failed to comply with the Act and set out details of the non-compliance, in a report under the Act or under the *Public Governance, Performance and Accountability Act 2013* (Cth). Relevant employers should be aware that new section 19CA of the Act provides that a relevant employer will be taken to have failed to comply with the Act without reasonable excuse, if the CEO of the organisation fails, without reasonable excuse, to comply with new section 16C of the Act (as discussed above).

New inclusions to the Gender Equality Indicators and Gender Equality Standards

We note that the Act has also been amended to refine the gender equality indicators to include matters relating to 'sexual harassment, harassment on the ground of sex or discrimination', to align with other changes relating to the Respect@Work legislation.

Finally, relevant employers should note that the Amending Act has amended relevant provisions of the Act to rename the current 'minimum standards' as 'gender equality standards'.

Conclusion

Organisations who are relevant employers should ensure executive staff are made aware of the new requirement to provide their WGEA gender equality reports to their governing bodies, to ensure compliance with the Act, and to avoid being publicly named by the WGEA on the list on non-compliant employers.

Please refer to these new changes as outlined in full in the **NATIONAL - Workplace Gender Equality** topic.

For more information please contact our team on **1300 862 667**
or visit our website **www.lawcompliance.com.au**

Base Line Reviews and Follow up Service

To complement our compliance service, Law Compliance also provides a comprehensive base line review service.

The purpose of the review is to examine an organisation's compliance with those Acts and Regulations which are relevant to its operations and to determine whether it has sufficient systems in place to meet those obligations. The review involves interviews and discussions with the organisation's staff and covers all Commonwealth and State Acts and Regulations relevant to the organisation.

The benefits of having our team conduct a base line review include:

- providing a cost-effective means of conducting a comprehensive compliance review without the need to commit significant staff resources;
- implementing an effective compliance program from the start and removing the overwhelming task of your team going through the obligations on their own; and
- the results of the review are entered into your Comply Online profile so that you are immediately on top of all of your current obligations (and only need to deal with future amendments).

Follow up reviews

Clients who have previously undergone a base line compliance review can also undertake a follow up review where our compliance solicitors work through the quarterly updates with your team, identifying any gaps and keeping you up to date.

If you would like more information about our base line review service, please don't hesitate to reach out to your client relationship manager.

Client in the Spotlight: Uniting Vic.Tas

Uniting Vic.Tas is the community services organisation of the Uniting Church in Victoria and Tasmania. The organisation employs 3,500 employees and 2,200 volunteers to deliver over 650 programs and services across the full spectrum of community services, intervening early to help people avoid crisis, as well as supporting those who live life at the margins. For over 100 years, Uniting has delivered community services to people across Victoria and Tasmania, empowering them to live happy and healthy lives.

We spoke to **Angela Giannoukos, Uniting's Program Lead Compliance**, to discuss their approach to legislative compliance and their experience 18 months after implementing Law Compliance.

1. How did you manage your legislative compliance before using Law Compliance's products and services?

Prior to implementing Law Compliance, Uniting managed its legislative compliance by tracking peak bodies including regulators and funders to identify relevant legislative changes. Federal and State Registers of Legislation were also reviewed to verify information about bills, regulations, and amendments. The manual process was time consuming and difficult to maintain because of the breadth and scale of the organisation's programs and services.

2. What problem(s) were you trying to solve with Law Compliance's products and services?

Uniting was looking for an automated compliance management system that would meet the following requirements:

- *Identify, monitor, and provide legislative updates relevant to our services and programs on a quarterly basis.*
- *Interpret the changes and provide guidance on what may need to change to ensure compliance e.g., policy, procedure, systems, processes.*
- *Organise the information by category or topic and be able to assign responsibility for each obligation.*
- *Obligation owners to be able to report compliance.*
- *Generate reports and dashboards.*
- *Access to a legal practitioner to help identify if laws are applicable or to obtain further information about new changes.*

3. What made Law Compliance stand out from other options?

A number of unique features to Law Compliance stood out from the other options explored. Comply Online, the information management system, was one of the simplest and easiest to use. Information is organised by category and topic, assigning responsibility is simple as is providing a compliance rating. The dashboard on the home page provides a quick overview of Uniting's compliance status which is useful information for our senior executives and/or Board.

The availability of lawyer to support the use of Law Compliance products and to ensure things ran smoothly was a huge plus for Uniting!

4. What are the most valuable features of Law Compliance's products and services?

Comply Online has enabled Uniting to automate the compliance function by providing a central system to store legislation and updates and report the organisation's compliance with these.

The Self-Assessment Questionnaires (SAQs) that come with legislative updates provide a simple way to self-audit against changes. All changes are highlighted (colour coded) in the SAQ which ensures they are immediately identified by type (new, enhanced, not relevant).

The customer support from the Client Relationship Manager has been quick and useful. Having access to a lawyer to answer your questions has been invaluable.

5. What have you been able to achieve since using our products and services?

Law Compliance has enabled Uniting to automate its compliance function by providing the information and tools obligation owners need to report legislative compliance. All processes related to legislative compliance have now been streamlined and a robust system of managing quarterly updates is in place. Obligation owners know they have 60 days to review updates, upload completed SAQs and provide a compliance status. Quarterly reporting to the executive team and Board come with dashboard reports generated by the system.

6. What tips or advice do you have for any organisation who need a hand with their legislative compliance?

If you are starting from scratch, familiarise yourself with a best practice standard like AS ISO 19600:2015 Compliance Management Systems – Guidelines. This will help you understand the compliance environment and the processes you will need to consider building your legislative compliance system.

If you are looking to increase the rigour of your system, audit the system to identify its strengthens and weaknesses and work from there. A best practice system ensures its users are set up to succeed. Ensure a policy and/or procedure set the organisation's position on legislative compliance; ensure users receive the training and tools necessary to perform their duties; and make sure the system's performance is transparent at all levels.

Cybersecurity and IT Management

Law Compliance is aware that everyone is constantly aiming to have the highest possible cybersecurity in place from spam and hackers, as we are too. Sometimes, unfortunately firewalls and spam filters are also preventing us from sending emails to our subscribers.

To ensure you receive all future communications promptly and avoid difficulties with our Law Compliance updates / alerts emails reaching you and/or your team (because of these varied spam filtering services falsely classifying emails as spam or going into junk folders), we ask that you please let your IT team know to whitelist the following Law Compliance addresses:

- **info@mailgun.lawcompliance.com.au**;
- **lawcompliance.com.au**;
- our account system **accountright@apps.myob.com**

Should you or your IT team have further questions regarding this, please feel free to contact us / your CRM.

Australian Capital Territory Update

Freedom of Information Amendment Act 2023 (ACT)

On 24 May 2023, the *Freedom of Information Amendment Act 2023* (ACT) (the **Amending Act**) commenced in full and made a range of notable amendments to the *Freedom of Information Act 2016* (ACT) (the **Act**).

Expanding the meaning of 'contrary to the public interest information'

Schedule 1 of the Act contains a list of information which is taken to be contrary to the public interest to disclose, subject to limited exceptions. The Amending Act has replaced the definition of **contrary to public interest information** under section 16 of the Act to clarify that the information contained in Schedule 1 (other than information subject to legal professional privilege) is not taken to be contrary to the public interest information if it identifies:

- corruption;
- the commission of an offence by a public official; or
- that the scope of a law enforcement investigation has exceeded the limits imposed by law.

Change to the public interest test

Section 17 of the Act sets out the steps that an agency or Minister must take, and the factors that must be considered, in deciding whether disclosure of information would, on balance, be contrary to the public interest. This includes a prohibition against consideration of the applicant's identity, circumstances or reason for seeking access to the information.

New section 17(3) of the Act now extends the section 17 test to clarify that in circumstances where an applicant seeks access to personal information that is not their own, when applying the public interest test, the agency or Minister may take into account the applicant's identity, circumstances and reason for seeking access to the information.

Deleting contrary to the public interest information from policy documents with open access information

Section 26 of the Act applies to records that contain open access information of an agency or Minister (as defined under section 23 of the Act) and information contrary to the public interest. Currently, an agency or Minister, where practicable, must make publicly available a copy of the record with the information contrary to the public interest redacted and publish a statement that the original record contained information contrary to the public interest that has been deleted from the copy.

New section 26(3) of the Act introduces an exclusion to section 26, setting out that the above-mentioned requirements do not apply if the record is a policy document of the agency and the information, other than the contrary to the public interest information, contained in the record has been otherwise made publicly available.

Under section 23(2) of the Act, Policy document:

- includes any of the following:
  - a document containing interpretations, rules, guidelines, statements of policy, practices or precedents;
  - a document containing a statement about how an Act or administrative scheme is to be administered;
  - a document describing the procedures to be followed in investigating a contravention or possible contravention of an Act or administrative scheme;
  - another document of a similar kind used to assist the agency to exercise its functions; but
- does not include a draft of a document mentioned above.

'Taken to agree' to a request for additional time to decide an application

Under section 41 of the Act, a respondent to an access application (an agency or Minister) may ask the applicant for an additional stated amount of time to decide the application. The amended section 41(4) of the Act now sets out that an applicant is 'taken to agree' to a request for additional time if the applicant does not refuse the request within 7 working days after the request is made and the respondent has not received notice that the applicant has applied for review under Part 8 of the Act.

Under the amended section 41(3) of the Act, if the applicant agrees or is 'taken to agree' to the request for additional time, the respondent may decide the application before the end of the additional time provided if the total time to decide the application would not be more than 12 months.

Additionally, new section 41(5) of the Act now states that a respondent can decide an application before the end of the additional time where the total time to decide the application would be more than 12 months but less than 24 months if the applicant agrees to the request and the respondent agrees to deal with the application progressively. New section 41(6) of the Act now provides that a respondent must not ask an applicant for additional time if the total time to decide the application will be more than 24 months (this was previously set at 12 months).

For the purposes of amended section 41 of the Act, **total period** to decide an access application, means the period:

- beginning on the day the respondent receives the application; and
- ending on the day the respondent decides the application.

Giving access in an alternative form

Section 47 of the Act lists the forms of access to government information that may be given to a person (i.e. electronic record, printed copy, sound recording etc). Currently, an alternative form of access may only be given where the form requested would unreasonably interfere with the exercise of the respondent's functions or involve an infringement of the copyright of a person other than the Territory.

Amended section 47(5) of the Act clarifies this exception, allowing access to be given in an alternative form if it is not reasonably practicable for the respondent to give access in the form requested and the respondent is reasonably satisfied the applicant can receive the information given in the alterative form.

Disclosure log requirements

Currently, under section 28(1) of the Act, an agency or Minister is required to keep a record of access applications made to the agency or Minister (a disclosure log). Amended section 28(1) of the Act instead imposes the obligation to maintain a disclosure log on the agency or Minster who deals with the access application, rather than the agency or Minister to which the application was made.

Changes to time frames

Time frames for various processes under the Act have been changed, including:

- **Section 34 (Deciding access – identifying information within scope of application)**: agencies will not need to deal further with an access application if it is suspended under this section for six weeks (previously 3 months).
- **Section 38 (Deciding access – relevant third parties)**: the time within which a relevant third party who objects to the disclosure of government information may provide its views on whether the information is contrary to the public interest information will be reduced from 15 working days to 10 working days.
- **Section 40 (Deciding access – time to decide)**: the respondent will have 30 working days (previously 20 working days) after receipt to decide an access application. If the respondent gives notice to the applicant for consultation on a proposed refusal to deal with the application (under section 46 of the Act) the time to decide the application is extended by the consultation period. Also, if the period to decide an access

application includes one or more Christmas shutdown days – the period is extended by those days.

- **Section 74 (Applications for ombudsman review)**: an application for ombudsman review of a decision to make open access information available will need to be made within 20 working days after the day the information was published.

New reviewable decisions

Finally, the following types of decisions have been added to the list of 'reviewable decisions' under Schedule 3 of the Act:

- a decision to make open access information publicly available by an agency or Minister under section 24(1) of the Act – reviewable by a person whose interests are affected by that decision;
- a decision to give access to government information under section 35(1)(a) of the Act – reviewable by the applicant, as well as a relevant third party.

Conclusion

Organisations should ensure that all staff are made aware of the new obligations set out above. Organisations should also update their policies and procedures, particularly noting the changes to existing access applications and time frame changes mentioned above, to ensure compliance with the new obligations. These are set out in more detail in the **ACT – Freedom of Information** topic.

For more information please contact our team on **1300 862 667**
or visit our website **www.lawcompliance.com.au**

New South Wales Update

Security Industry Amendment Act 2022 (NSW)

On 1 June 2023, the *Security Industry Amendment Act 2022* (NSW) (the **Amending Act**) amended the *Security Industry Act 1997* (NSW) (the **Act**) and the *Security Industry Regulation 2016* (NSW) (the **Regulation**) to introduce a three-tier penalty system which increases the maximum penalties for individuals and body corporates, among other changes.

Three-tier penalty system

Previously, a contravention of a licence condition under the Act would not incur a statutory penalty. With the introduction of the Amending Act, licensees under the Act would need to be aware of the three-tier penalty system which provides for the severity of penalties according to its tiers, and is described as follows:

- Maximum penalty for Tier 1 condition:
  - for a corporation – 100 penalty units; or
  - for an individual – 50 penalty units; and
- Maximum penalty for Tier 2 condition:
  - for a corporation – 200 penalty units; or
  - for an individual – 100 penalty units or imprisonment for 6 months, or both; and
- Maximum penalty for Tier 3 condition:
  - for a corporation – 500 penalty units; or
  - for an individual – 250 penalty units or imprisonment for 12 months, or both.

Special condition for provision of workers – master licences

The new section 22A of the Act creates an offence if a master licensee provides prescribed work to an ineligible person. Nevertheless, a master licensee may raise a defence if, after thorough investigation, the master licensee did not know the person was ineligible or could not reasonably have known that the person was an ineligible person.

In addition, the master licensee must not:

- allow persons to carry on security activities with a dog except with the approval of the Commissioner;
- indirectly allow persons to carry on a security activity through an arrangement with another person unless the other person holds a master licence or a visitor permit authorising the holder to carry on such security activities.

The newly inserted section 38C of the Act provides a similar obligation for allowing a person to undertake prescribed work. However, the penalty for contravening section 38C is not as severe as a master licensee contravening section 22A, with the penalty under section 22A, being a Tier 3 penalty.

A person is an **ineligible person** if the person:

- is not eligible to hold a licence because of section 16; or
- has, in the previous 5 years, been refused a licence by the Commissioner; or
- has, in the previous 5 years, had a licence revoked under section 26(1A).

Prescribed work means the following:

- work in the cash-in-transit sector of the security industry;
- work in any area involving access to operational information relating to the licensee's security business;
- work requiring the person to roster or schedule the carrying on of any security activity by a person who holds a class 1 or class 2 licence, or monitor the performance of a person who holds a class 1 or class 2 licence in carrying on a security activity.

Offence of altering, damaging or destroying records and other things

Under the new section 39U of the Act, a person must not without reasonable excuse, alter, damage, or destroy a document or other thing that is required to be kept or to be produced under the Act or the regulations.

Conclusion

Organisations that employ security guards or provide persons to engage in security activities should familiarise themselves with their new responsibilities under the *Security Industry Act 1997* (NSW) and the *Security Industry Regulation 2016* (NSW) as summarised above and outlined in detail in the **NSW – Security** topic. In addition, organisations should update their systems, policies and procedures to ensure compliance of the revised Act and Regulation.

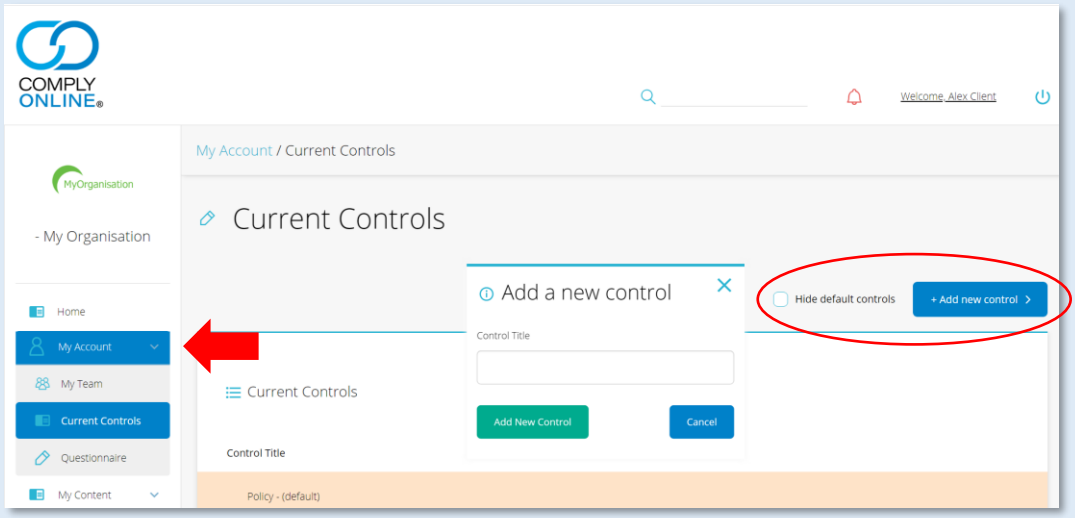
New feature in Comply Online® – Recording and Reporting Controls

Premium clients – you now have the ability to record your own list of controls and assign them to each topic.

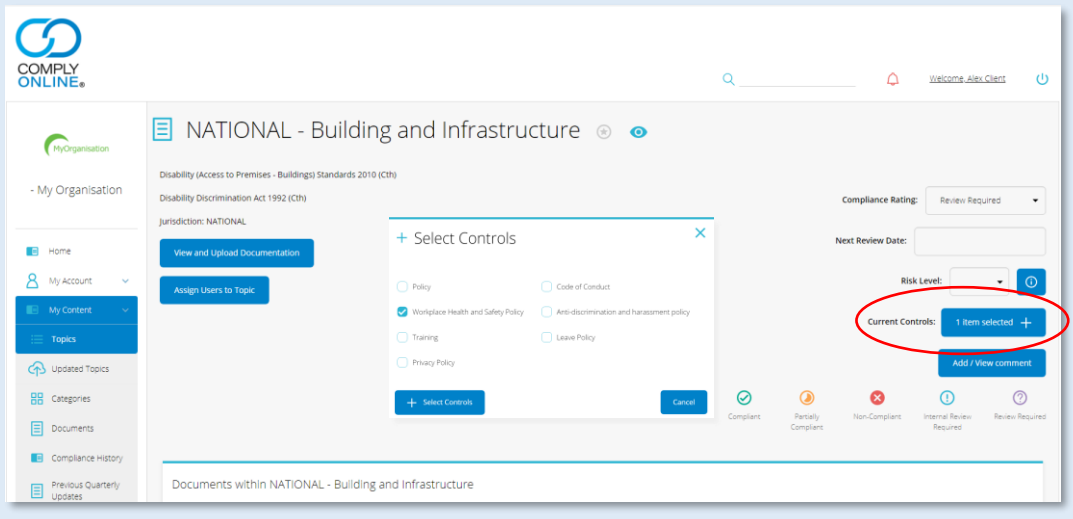
This new functionality allows you to map all of your organisation's compliance information in one place and removes the need for users to record relevant controls in the comments section on the topic page. Subscribers of our Self-Assessment Questions (SAQ) product will be able to reflect the information that is recorded in the **Current Control** column of the SAQ word document.

To use this feature, click the new **Current Controls** sub-listing located under the **My Account** tab on the Homepage. Here you can add and edit your own list of controls. We have also added a number of default options such as "Policy" and "Code of Conduct" that are visible to all clients. These can be hidden at any time by ticking the box (see below) if you only want to view your own list.

On each topic page, there is a new button called **Add Controls +** where you can select one or more control from your list. This information is then exported into a new column in the Topic Compliance Spreadsheet and also in the PDF Compliance Report (you will need to tick the option of including this information).



If you have any questions or feedback, please contact your CRM.

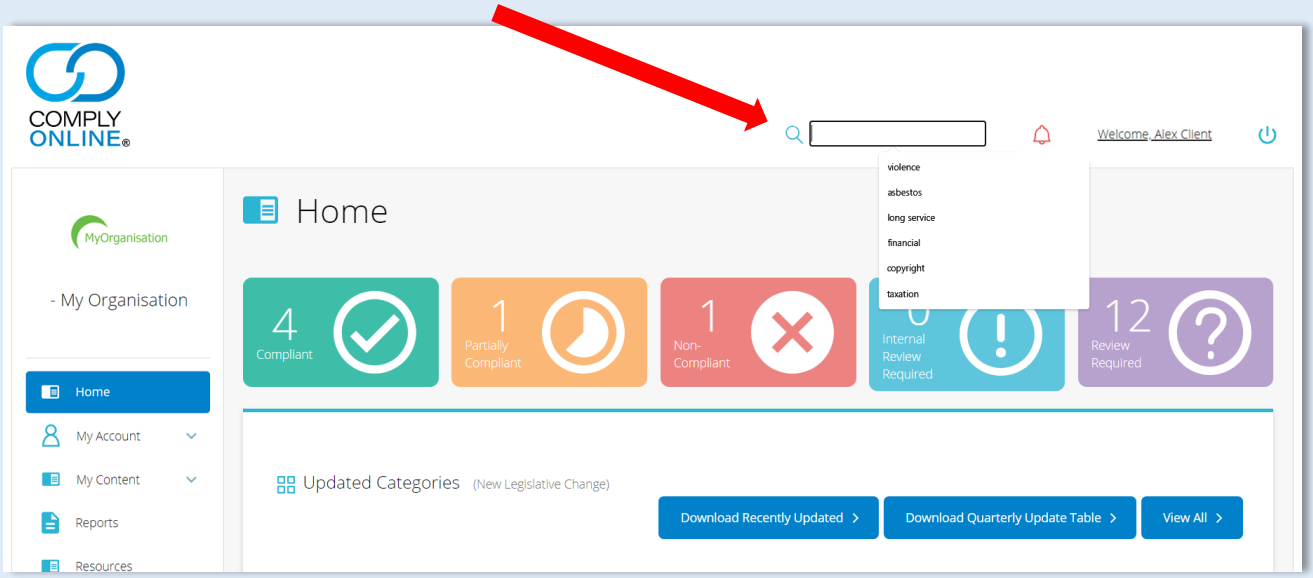


You can find more new Comply Online® features on page 20

Comply Online® Tip – Using the Search Functionality

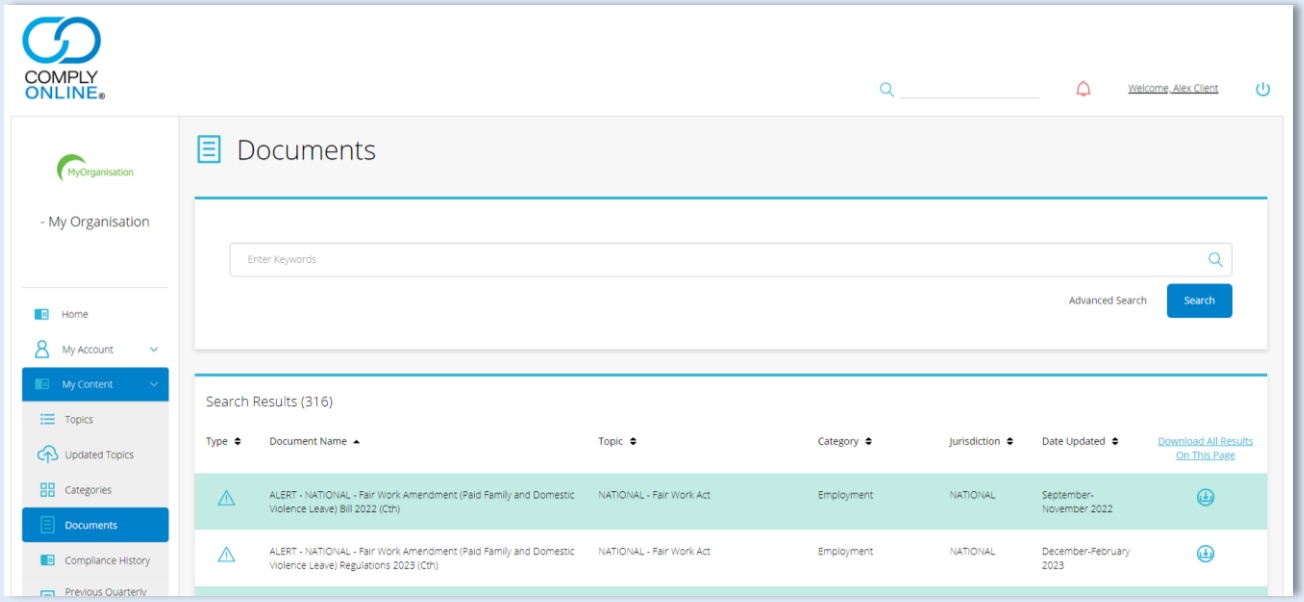
1. Searching for a topic

Using the search function at the top of the Homepage will search across the **titles** of the topics on your profile. It will also search for the word across the **legislation** on your profile. For example, searching the word "violence" will bring up TAS – Family **Violence** Reporting because the word is in the topic title, but also TAS – Minors and Children because it covers the *Family **Violence** Act 2004* (Tas).



2. Searching within a topic

You can also search for a term **within** all of the documents on your profile. Click on the "Documents" tab on the left taskbar menu and enter your term in the search bar at the top. In this case, again searching for the word "violence", documents from the NATIONAL – Fair Work Act topic have come up as the topic covers Domestic **Violence** Leave. You can also use the advanced search to specify which product you want to search within (or any of the other parameters).



If you have any questions or feedback, please contact your CRM.

Northern Territory Update

Work Health and Safety (National Uniform Legislation) Amendment Regulations 2023 (NT)

On 2 March 2023 the *Work Health and Safety (National Uniform Legislation) Amendment Regulations 2023* (NT) (the **Amending Regulations**) were made and commencing on 1 July 2023, amending the *Work Health and Safety (National Uniform Legislation) Regulations 2011* (NT) (the **Regulations**). The Amending Regulations introduce new obligations to implement control measures to eliminate and reduce psychosocial hazards and risks.

Psychosocial risks and hazards

The Amending Regulations introduce new obligations by which a person conducting a business or undertaking will be required to manage psychosocial risks. The person conducting the business or undertaking will have an obligation to implement control measures:

- to eliminate **psychosocial risks** so far as is reasonably practicable; and
- if it is not reasonably practicable to eliminate **psychosocial risks**, to minimise the risks so far as is reasonably practicable.

The person conducting the business or undertaking will be obligated to have regard to a variety of relevant matters in determining which controls measures to implement, including:

- the duration, frequency and severity of the exposure of workers and other persons to the **psychosocial hazards**;
- how the **psychosocial hazards** may interact or combine;
- the design of work, including job demands and tasks;
- the systems of work, including how work is managed, organised and supported;
- the design and layout, and environmental conditions, of the workplace, including the provision of safe means of entering and exiting the workplace and facilities for the welfare of workers;
- the design and layout, and environmental conditions, of workers' accommodation;
- the plant, substances and structures at the workplace;
- workplace interactions or behaviours; and
- the information, training, instruction and supervision provided to workers.

Relevantly, a **psychosocial risk** is a risk to the health or safety of a worker or other person arising from a psychosocial hazard which is defined as a hazard that may cause psychological harm and arises from or relates to:

- the design or management of work;
- a work environment;
- a plant at a work; or
- workplace interactions or behaviours.

Please click here to access the full Bill.

Queensland Update

Housing Legislation Amendment Act 2023 (Qld)

On 5 April 2023, relevant provisions of the *Housing Legislation Amendment Act 2023* (Qld) (the **Amending Act**) commenced and amended the *Retirement Villages Act 1999* (the **Act**). The Amending Act has inserted into the Act two new obligations for retirement village scheme operators which impose requirements for the form and content of financial documents and require a scheme operator to provide draft budgets and an independent quantity surveyor's report if requested by a resident or the residents committee. There are consequential amendments throughout the Act and high penalties are imposed for non-compliance.

New obligation – Form and content of financial documents

The Amending Act has inserted a new obligation into the Act which contains requirements for the form and content of financial documents. Section 113AA provides that a financial document must:

- be in the approved form;
- be in the form, and include the information, prescribed for the document by regulation; and
- be prepared in accordance with standards or principles prescribed for the document by regulation.

The regulations may make further prescriptions for section 113AA.

Documents which must comply with section 113AA

Relevantly, **financial documents** are defined in section 113AA to mean:

- a capital replacement fund budget;
- a maintenance reserve fund budget;
- a general services charge budget;
- a quarterly financial statement;
- an annual financial statement;
- an audit report; and
- an independent quantity surveyor's report.

Consequential amendments to sections 112 and 113 of the Act require quarterly financial statements, annual financial statements and audit reports to comply with section 113AA. The penalties for non-compliance in these sections remain unchanged, and transitional provisions note that the requirement for annual financial statements to comply with section 113AA will not apply to an annual financial statement or audit report for the financial year ending 30 June 2023.

The relevant amendments for the other documents listed above are discussed below.

New obligation – Providing draft budgets and independent quantity surveyor's report

New section 113AB of the Act empowers a resident or the residents committee to give written notice to the scheme operator at least 28 days before the beginning of a financial year, requesting the scheme operator to give the resident or residents committee a copy of a draft budget for the financial year.

If a scheme operator is given notice under section 113AB, it must prepare the draft budget and at least 14 days before the beginning of the financial year give the resident or residents committee a copy of the draft budget and any independent quantity surveyor's written report that the scheme operator had regard to for the preparation of the draft budget. The maximum penalty for non-compliance with this section is 200 penalty units (currently **$28,750**).

Changes to capital replacement fund, maintenance reserve fund and general services charge budget

Amendments to capital replacement fund and maintenance reserve fund

Amendments to sections 92(1) (in relation to capital replacement fund) and 98(1) (in relation to maintenance reserve fund) of the Act require a scheme operator to:

- obtain an independent quantity surveyor's written report about the expected capital replacement costs for the village for the next 10 years before deciding a budget under sections 93 and 99, respectively, and comply with section 113AA (discussed above). The unchanged maximum penalty for non-compliance with both sections is 540 penalty units (currently **$77,625**).
- give the chief executive a copy of the full or updated independent quantity surveyor's written report obtained during the financial year within 5 months of the end of the financial year. The maximum penalty for non-compliance is 200 penalty units (currently **$28,750**).

Transitional provisions note that these requirements will not apply to an independent quantity surveyor's report obtained or updated before 1 July 2023.

Amendments to section 93(1) (in relation to capital fund replacement) and 99(1) (in relation to maintenance reserve fund) of the Act:

- require compliance with section 113AA (discussed above). The unchanged maximum penalty for section 93(1) and the new maximum penalty for 99(1) is 200 penalty units (currently **$28,750**).
- repeal the process by which a resident or the residents committee may ask the scheme operator to give the residents committee a copy of the draft capital replacement fund budget or draft maintenance reserve fund budget for the financial year at least 14 days before the beginning of the financial year to which the relevant draft budget relates and the obligation for the scheme operator to comply with this request.

Further amendments in relation to capital replacement fund only

Section 92(3) of the Act now provides that the scheme operator may use all or part of an ingoing contribution to pay the capital replacement fund contribution but must not otherwise raise, or attempt to raise, all or part of the capital replacement fund from residents.

The Amending Act has repealed:

- the requirement in section 92(5) of the Act for the scheme operator to decide the amount the operator must pay to the fund to reach the capital replacement reserve within the relevant period;
- the requirement in section 92(7) to adjust the capital replacement fund contribution annually to ensure the capital replacement reserve is reached within the relevant period; and
- the definition of a capital replacement fund contribution in section 18 of the Act.

Amendments to general services charge budget

Section 102A of the Act now requires the general services charge budget to comply with section 113AA. Despite this new requirement regarding the form and content, there are no changes to the requirements for the budget to allow for raising a reasonable amount to provide the general services for the financial year and fix the amount to be raised by way of contribution to cover the amount. However, there is a new maximum penalty for non-compliance with these obligations which is 200 penalty units (currently **$28,750**).

Similar to the amendments made to sections 93 and 99 of the Act (discussed above), other amendments to section 102A:

- repeal the process by which a residents committee may ask the scheme operator to give the residents committee a copy of the draft general services charge budget for the financial year at least 14 days before the beginning of the financial year and the scheme operator's obligation to comply; and

- clarify that the scheme operator must fix the total general services charge (mentioned in section 106 of the Act) after the scheme operator has complied with this section.

Other changes

Further amendments to section 113 of the Act provide that if, at any time during a financial year, no standards or principles for the preparation of audit reports are prescribed, an audit report for an annual financial statement for the financial year must be prepared in accordance with the Australian Auditing Standards.

Amendments to section 131 of the Act require a scheme operator to call an annual meeting as soon as reasonably practicable after the financial statements and audit report are available. Previously, only the financial statements were required before an annual meeting was called.

Finally, an amendment to section 74 of the Act clarifies that a scheme operator is required to give the chief executive of the Department of Communities, Housing and Digital Economy a copy of the amended village comparison document as well as written notice of amendment, within 28 days after the amendment takes place because of a material change to any of the information in the document.

Conclusion

The Act contains new and amended obligations that affect **retirement village scheme operators**. Subscribers should review and, if required, update their policies, processes and systems to reflect the changes. All relevant staff should be made aware of the changes.

The Law Compliance team have amended the topic **QLD – Retirement Villages** which sets out the new and amended obligations in detail.

For more information please contact our team on **1300 862 667**
or visit our website **www.lawcompliance.com.au**

South Australia Update

Statutes Amendment (Transport Portfolio) Act 2021 No. 17 (SA)

On 12 December 2022, parts of the *Statutes Amendment (Transport Portfolio) Act 2021* No. 17 (SA) (the **Amending Act**) commenced. The Amending Act amended the *Rail Safety National Law (South Australia) Act 2012* (SA) (the **Rail Safety National Law**) to provide for compulsory blood testing of rail safety workers following a prescribed notifiable occurrence. In addition, registered nurses are now allowed to take blood samples under the *Road Traffic Act 1961* (SA) (the **RT Act**).

Compulsory blood testing following a prescribed notifiable occurrence

Section 16(1) of the Rail Safety National Law provides that when a rail safety worker experiences an injury due to a prescribed notifiable occurrence and seeks medical attention at a hospital within eight hours of the incident, the attending medical practitioner must ensure a blood sample is collected from the worker as soon as possible, regardless of the worker's consciousness.

Under section 16(2), if a rail safety worker sustains an injury from a prescribed notifiable occurrence and the worker either arrives deceased at the hospital or passes away within eight hours of hospital admission before a blood sample has been collected, the attending medical practitioner, who is obliged under the Coroners Act 2003 (SA) to inform the State Coroner or a police officer of the death, must:

- ensure a blood sample is collected from the deceased; or
- inform the State Coroner as soon as possible, that a blood sample should be obtained from the deceased due to the circumstances surrounding the death.

In either of the circumstances described above, the blood sample may be taken by a medical practitioner or a registered nurse.

Prescribed notifiable occurrence is a Category A notifiable occurrence and is detailed in Part 1 of Schedule 1A of the *Rail Safety National Law National Regulations 2012* (SA) (the **Rail Safety National Regulations**) and includes, for example, train collisions and derailments.

Processes for collecting blood samples

Section 17 of the Rail Safety National Law details the processes relating to the collection of blood samples taken in the circumstances described above or Part 3 Division 9 of the Rail Safety National Law, and are as follows:

- the medical practitioner or registered nurse must:
  - divide the sample equally into two separate containers, each marked with a unique identification number, and seal them;
  - provide written notice to the individual from whom the sample was taken, or in the case of a sample taken under section 16(2), leave with the person's personal effects at the hospital, containing the following information:
    - advising that the sample was collected;
    - advising that a container holding part of the sample, marked with the specified identification number, will be available for pickup by or on behalf of the individual at a specified location;
    - any other information prescribed by the Rail Safety National Regulations;
  - complete and sign a certificate which includes the following information:
    - the sample's identification number marked on the containers;

  - the name and address of the person from whom the sample was taken;
  - the name of the medical practitioner or registered nurse who collected the sample;
  - the date, time and location of the sample collection;
  - confirmation that the notice referred to in section 17 was provided to the person from whom the sample was taken or left with their personal effects;
- make the containers and certificate accessible to an authorised person;

- each container must contain enough blood for an analysis of alcohol concentration or drug presence in the blood to be conducted;
- the medical practitioner or registered nurse responsible for collecting the sample must take reasonable measures to ensure the blood is not contaminated and does not degrade, preventing the analysis of alcohol concentration or the presence of a drug in the blood to be conducted;
- one of the containers containing the sample must:
  - as soon as possible, be transported by an authorised person or approved courier to the location specified in the notice provided to the person or left with the person's personal effects; and
  - remain available for pickup by or on behalf of the individual for the period prescribed by the Rail Safety National Regulations.

Blood testing under the *Road Traffic Act 1961* (SA)

Previously under section 47I of the RT Act, only medical practitioners were allowed to conduct blood testing of a person involved in a motor vehicle accident. Under the amendments, registered nurses can now carry out blood testing. The processes for taking a blood sample remain the same. The medical practitioner and registered nurse must follow the procedures set out in clause 2 of Schedule 1 of the RT Act.

In addition, the Amending Act clarifies that a sample of oral fluid or blood taken under section 47E, 47EAA or 47I of the RT Act must not be used except for a purpose contemplated under the RT Act or for research for prescribed purposes relating to drugs present in the oral fluid or blood, provided that:

- the research may only be used or released if personal information is de-identified; and
- DNA analysis of the sample is not conducted.

Conclusion

Organisations should familiarise themselves with their new responsibilities under the *Rail Safety National Law (South Australia) Act 2012* (SA) and the *Road Traffic Act 1961* (SA), as summarised above and outlined in detail in the **SA – Compulsory blood testing** topic. In addition, organisations should update their systems, policies and procedures to ensure compliance with the revised Acts.

For more information please contact our team on **1300 862 667**
or visit our website **www.lawcompliance.com.au**

Staff News

Law Compliance is growing!

We are delighted to welcome **John Tranter** who has joined our IT team as Senior Software Developer. John is a well established developer who is responsible for designing, testing and implementing updates to the technology products produced by the firm.

Tasmania Update

Justice Miscellaneous (Royal Commission Amendments) Act 2023 (Tas)

The *Justice Miscellaneous (Royal Commission Amendments) Act 2023* (Tas) (the **Amending Act**) commenced in full on 20 April 2023 and implements recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse.

New offence – Failure by a person in authority to protect a child from a sexual offence

The Amending Act has amended the *Criminal Code Act 1924* (Tas) (the **Criminal Code**) by inserting a new section 125E. Section 125E of the Criminal Code provides that a person (the **accused person**) is guilty of a crime if they:

- occupy a position within, or in relation to, a relevant organisation; and
- have a reasonable belief that there is a substantial risk that a relevant child may become the victim of a sexual offence committed by another person (the **perpetrator**) who is 18 years of age or more and associated with the relevant organisation; and
- have the power or responsibility to reduce or remove that risk, by reason of their position; and
- fail to take all reasonable steps in the circumstances to reduce or remove that risk.

A **relevant organisation** means an organisation that exercises care or authority over children and includes, but is not limited to, a religious organisation, a school, an education or care service, a childcare service, a hospital, a council, a state service agency, a sporting group, a youth organisation, a charity or benevolent organisation, an organisation providing out-of-home care or a community service organisation.

The person referred to as the **perpetrator** in the new section 125E of the Criminal Code means a **person associated** with the relevant organisation who is over 18 years of age. This includes, but is not limited to, a person who is an officer, employee, manager, owner, volunteer, contractor or agent of the organisation but does not include a person solely because the person receives services from the organisation.

A **child** means anyone who is under the age of 18 years, and a **relevant child** means any child who is, or may come, under the care, supervision or authority of the relevant organisation.

The Amending Act also provides that, for the purposes of the new section 125E of the Criminal Code, it is immaterial that:

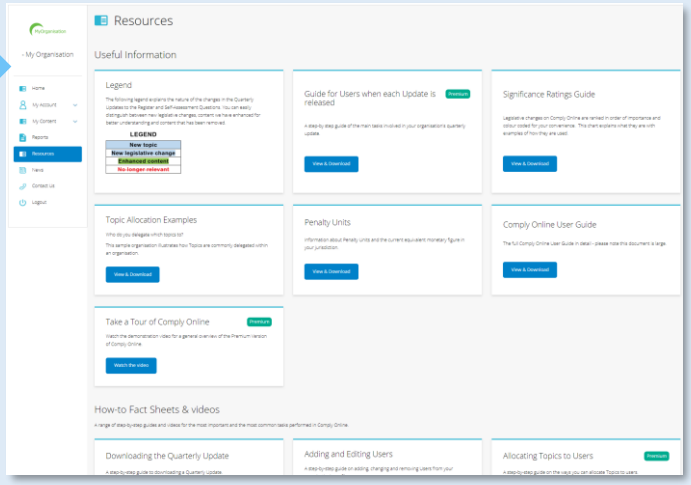
- some or all of the circumstances constituting this offence occurred outside Tasmania, so long as the relevant child was in Tasmania at any time while the substantial risk referred to in this offence existed; and
- both the accused person and the relevant child were outside Tasmania at the time at which some or all of the circumstances constituting this offence occurred, so long as the sexual offence was at risk of occurring in Tasmania.

Conclusion

Organisations should ensure that all staff are made aware of the new obligations set out above. Organisations should also update their policies and procedures to ensure compliance with the new obligations, which are set out in more detail in the **TAS – Minors and Children** topic.

New features in Comply Online®

1. New **Resources** page allowing users to easily navigate our user guides, fact sheets and instructional videos

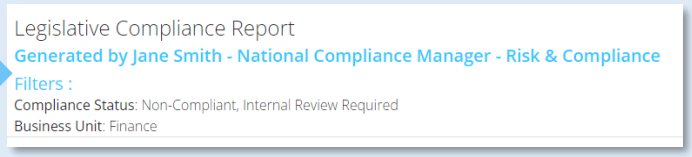


2. Updated colour coding for **Topic Compliance Spreadsheet** and **Quarterly Update Table** matching the Dashboard on the Home page

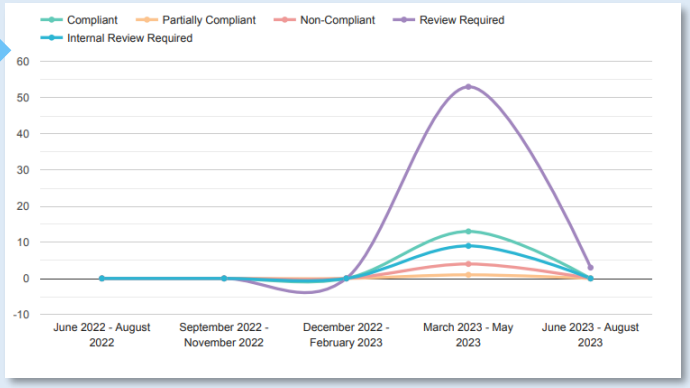
F	G	H
ss Unit	Compliance Rating	Risk Level
	Review Required	No Risk Rating
	Review Required	No Risk Rating
ompliance	Compliant	Medium
	Partially Compliant	No Risk Rating

3. Files up to 100mb in size can now be uploaded to Comply Online® against a topic as evidence

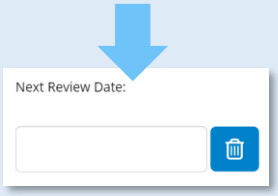
4. The customised **Compliance Report** now includes what filters were selected when generating the report



5. Compliance statuses of 'Review Required' and 'Internal Review Required' are now included in the line graph of the **Compliance Report**



6. Next Review Dates can now be cleared by clicking on the rubbish bin icon

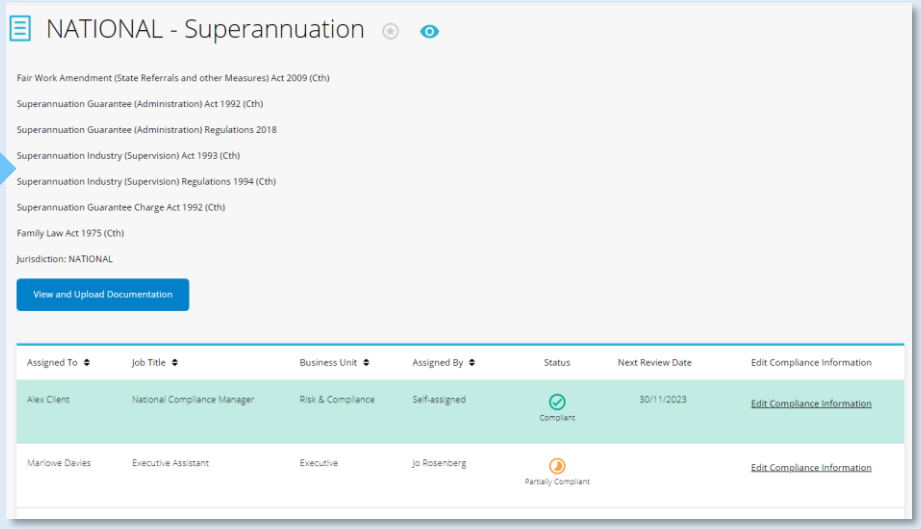


7. Once a Next Review Date has passed, users can now be alerted by email to review the topic

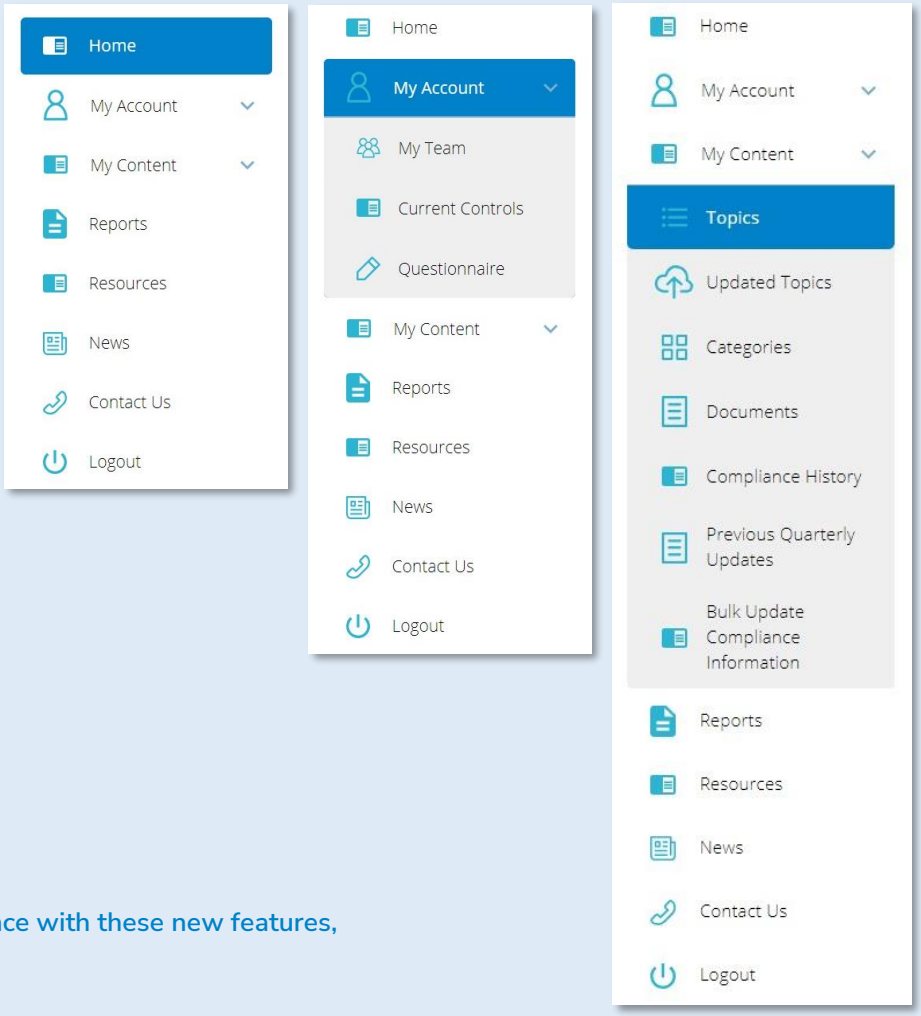
This feature is by default turned off. Please let your CRM know if you would like this feature turned on for your organisation. Note that it will be applied to all users in your organisation who have been assigned topics. Please note that alerts will only be sent for dates after this feature was turned on for your organisation, so email alerts will not be sent for Next Review Dates which have already passed.

8. Updating the compliance information for a topic has been updated and simplified on the topic page for Primary users.

Now once the topic has been assigned, the compliance information table is spread across the entire page and includes the Next Review Date and the wording of the compliance status (ie. Compliant), not just the compliance status symbol. This makes it easier for Primary users to quickly identify the compliance information of topics and also where topics have been self-assigned.



9. Sub navigation has been added to the site, clearing the left menu panel and improving ease of use/navigation for users.



For more information or assistance with these new features, please contact your CRM.

Victoria Update

Education Legislation Amendment (Adult and Community Education and Other Matters) Act 2022 (Vic)

On 24 May 2023, relevant provisions of the *Education Legislation Amendment (Adult and Community Education and Other Matters) Act 2022* (the **Amending Act**) commenced and amended the *Education and Training Reform Act 2006* (Vic) (the **Act**). The Amending Act has amended existing obligations relating to the access, use and disclosure of Victorian student numbers or related information by authorised users and has introduced new obligations on authorised users to comply with any guidelines issued by the Secretary and the *Privacy and Data Protection Act 2014* (Vic) in relation to handling personal information or unique identifiers.

Amended – Authorised users must act in accordance with Division 3 of Part 5.3A

Section 5.3A.10 of the Act has been replaced and now provides that an **authorised user** must not access, use or disclose a Victorian student number or related information except in accordance with Division 3 of the Act. The penalty for failing to comply with this obligation remains the same and is 30 penalty units (currently, **$5,547.60**). This section does not apply to a statutory authority.

The definition of **authorised user** is unchanged and means a person or body or class of persons or bodies authorised under section 5.3A.9. Section 5.3A.9 allows the Secretary to authorise, in writing, a person, body or class of persons or bodies to access, use or disclose one or more Victorian student numbers or related information. Such authorisations may be subject to conditions and may be revoked by the Secretary at any time.

New – Authorised users must comply with guidelines issued by the Secretary

The Amending Act has inserted section 5.3A.10B into the Act which requires an authorised user to comply with guidelines issued by the Secretary (if any) under section 5.3A.10A of the Act that relate to the authorised user. Notably, an authorised user's failure to comply with guidelines issued by the Secretary under section 5.3A.10A does not constitute an offence against section 5.3A.10 (discussed above).

The Secretary is required to issue guidelines under section 5.3A.10A of the Act addressing the following matters:

- the manner in which an authorised user may access, use or disclose the Victorian student number or related information for a purpose specified in section 5.3A.9(2);
- the storage and destruction of the Victorian student number or related information in the Student Register;
- any prescribed matter; and
- any matter specified in a Ministerial Order.

Further, the Secretary may also issue guidelines addressing the following matters:

- matters to be considered in relation to giving an authorisation;
- the types of persons, bodies or classes of persons or bodies who may be authorised by the Secretary;
- matters to be considered in relation to revoking an authorisation;
- notification of the making of an authorisation;
- reporting requirements for authorised users;
- any other matter determined by the Secretary;
- any prescribed matter; and
- any matter specified in a Ministerial Order.

The Secretary is required to publish any issued guidelines on an appropriate Internet site as soon as possible after they are issued and may review and amend any issued guidelines at any time as the Secretary considers necessary.

New – Application of *Privacy and Data Protection Act 2014* (Vic) to certain authorised users

The Amending Act has inserted section 5.3A.10C into the Act which states that the *Privacy and Data Protection Act 2014* (Vic) applies to the handling of personal information or unique identifiers by an authorised user as if the authorised user were an organisation within the meaning of the *Privacy and Data Protection Act 2014* (Vic).

Importantly, this section applies to an authorised user that is not an organisation within the meaning of the *Privacy and Data Protection Act 2014* (Vic) or that is subject to the *Privacy Act 1988* (Cth) or any other law in Victoria which applies the *Privacy Act 1988* (Cth).

Conclusion

The Act contains new and amended obligations that affect authorised users. Subscribers should review and, if required, update their policies, processes and systems to reflect the changes. All relevant staff should be made aware of the changes.

The Law Compliance team have amended the topic **VIC – Education Services** which sets out the new and amended obligations in detail.

Western Australia Update

Public Health Amendment Regulations 2023 (WA)

On 29 May 2023 the *Public Health Amendment Regulations 2023* (WA) (the **Amending Regulations**) amended the *Public Health Regulations 2017* (WA) (the **Regulations**) to include the 'Monkeypox virus infection' as a disease declared to be a notifiable infectious disease.

Inclusion of 'Monkeypox virus infection' as a notifiable infectious disease

Regulation 3 of the Regulations outline the diseases that are declared to be notifiable infectious diseases and which must be reported to the Chief Health Officer (Department of Health (**WA Health**)) under sections 94, 95 and 96 of the *Public Health Act 2016* (WA) (the **Act**).

The Amending Regulations have now included 'Monkeypox virus infection' in the table listed under Regulation 3 of the Regulations, as an urgently notifiable infectious disease. As an urgently notifiable infectious disease, WA Health must be notified of cases of Monkeypox virus infection as soon as is practicable, and in any event within 24 hours.

Organisations should keep in mind that a failure to properly notify urgently notifiable infectious diseases (including Monkeypox virus infection) is an offence that can result in a fine of $10,000.

Conclusion

Organisations should ensure that their clinical policies and procedures are updated to include the 'Monkeypox virus infection' as an urgently notifiable infectious disease.

The amendment can be viewed in full in the updated **WA – Diseases** topic.

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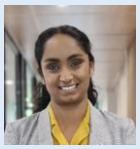

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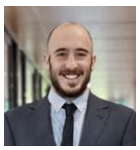

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