

Digital work systems and WHS

The governance shift leaders can no longer ignore

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Digital work systems (DWS) are becoming central to how we think about and manage Workplace Health and Safety (WHS). The same systems driving productivity, pace and consistency can also create safety risks. Leaders will increasingly be expected to show how both are being governed.

The issue hiding in plain sight

In many organisations, digital work systems have become part of the background infrastructure: embedded, influential and rarely challenged. Yet they increasingly determine how work is allocated, monitored and measured, shaping how work is experienced on the ground.

Tools designed to lift efficiency, consistency and scale can also intensify workload, increase surveillance and amplify [psychosocial risk](#). A familiar pattern emerges yet again: technology, procurement and operations move quickly, while WHS is considered later, if at all.

Now the gap is becoming much harder to defend. NSW is the first Australian jurisdiction to amend the *Work Health and Safety Act 2011* to expressly address Digital Work Systems. The effect is simple but significant: if a system is used to plan, allocate or monitor work, and it can affect health and safety, it requires WHS governance.

And the signal reaches beyond NSW. Similar to what we've seen before with the inclusion of the explicit psychosocial hazard requirements under the Act, once digital work systems have been named explicitly in law, it becomes much harder for any organisation to argue that the associated risks were unforeseeable.

Key safety risks can emerge from:

- **Workload pressure:** when systems reward speed in ways that push people to rush, skip checks or work through breaks.
- **Performance distortion:** when metrics penalise safe behaviour, discretion or time spent supporting challenging customers and colleagues.
- **Excessive monitoring or bias:** when surveillance (including AI) or automated decision rules create unreasonable pressure or systematically disadvantage parts of the workforce.

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The most material risk is often not the technology itself, but the way it is already shaping work beyond leadership's line of sight.

Patricio Estevez, Partner, Environment, Health and Safety, Ernst & Young, Australia



The better the question.
The better the answer.
The better the world works.



Where the pressure shows up first

The implications show up first in governance, oversight and the organisation's ability to understand and explain how digital decisions are being challenged.

1 For PCBUs the implication is immediate

Digital work systems used to allocate or monitor work need to be visible, understood and governed across their full digital lifecycle.

The highest-leverage controls often sit upstream, when system logic, performance settings, data inputs, decision rules and escalation pathways are still being defined and can be influenced before risk is hardwired into day-to-day operations.

This may not be as easy for existing systems, which will require organisations to know where and how those systems operate, what risks they create (or could create) and whether the people overseeing them are equipped to challenge how they work in practice.

2 For executives and boards, the test is more strategic

Leaders need to understand how DWS design and use can create harm, recognise that risk can accumulate quietly through data, rules and automation, and ensure governance is strong enough to identify blind spots before they become incidents, disputes or regulator questions.

For many organisations, this will expose weaknesses in governance, assurance and reporting as Officers will not be able to rely only on traditional WHS indicators to gain visibility of risks and understand control effectiveness.

3 For WHS functions, early engagement is key

Health and safety teams need to consider whether they have the digital knowledge to actively participate in discussions about and challenge the DWS design processes end-to-end. This means engaging not only after implementation, but through all stages, before risks are embedded into day-to-day work.

Regulators now have a clearer platform to ask a sharper question: do you understand how your DWS shape risk, and can you demonstrate that those risks are being controlled?

What organisations should do next

A DWS is not limited to advanced AI or complex algorithms. In practice, it may include digital tools used to facilitate work in a way that could affect health and safety. For many, the challenge is the breadth of the issue.

Stop treating DWS as just a technology issue

The bill makes explicit that PCBUs must ensure that workers are not exposed to health and safety risks from digital work systems, placing a strong focus on psychosocial harm arising from how work is allocated, assessed and monitored.

Look closely at how work is really being directed

The immediate question is how work is being directed through these systems and whether those settings are creating risk. Organisations should check that workers are not put at risk by the way work is allocated through a DWS. The focus is less on the technology itself and more on how the business configures, uses and governs it.

Prepare for more scrutiny

The amendments expand the ability of WHS entry permit holders to inspect a DWS. Systems that may once have sat outside direct scrutiny could now be examined more closely. Raising a new challenge: enabling appropriate access while managing privacy, intellectual property and commercial sensitivities.

“DWS risk is not invisible because it is technically complex. It is invisible because ownership is fragmented and governance arrives too late.

Karen Mealmaker, Partner, Environment, Health and Safety, Ernst & Young, Australia



The five questions that matter now

Before launching a DWS transformation effort, leaders should ask whether the risks are visible, owned and under control.

A strong starting point is a hard, honest check on whether your organisation can answer the following questions with confidence.

Question	Yes	No	Unsure
Do you know all DWS used by your organisation (including contractors)?			
Do you know what risks workers are exposed to from current DWS, and who owns/manages those risks?			
Do you know which and how DWS influence how work is allocated, assessed, experienced and monitored?			
Do you identify, consider and manage health and safety risks across the full lifecycle of a digital system (not just after implementation)?			
Do you know whether controls are implemented and effective for current DWS risks, and do you have assurance/reporting that verifies control effectiveness as the organisation scales or changes?			

If you have answered 'No' or 'Unsure' to any of these questions, it suggests your governance arrangements are not keeping pace with emerging risk.

Technical targeted action is essential. EY offers five DWS solutions for immediate support:

- 1 Risk Snapshot:** identify where digital work systems are influencing work, what WHS risk may be emerging and where immediate attention is needed.
- 2 Control Blueprint:** define controls, decision points and accountabilities needed to manage DWS related risks in a way that responds to WHS obligations.
- 3 Lifecycle Integration:** embed WHS into the design, procurement, implementation, use, review and change of DWS, preventing risks from becoming embedded in day-to-day processes.
- 4 Leadership Ready:** equip Officers and decision-makers with capability to understand, challenge and oversee DWS-related risks.
- 5 Governance and Assurance Framework:** strengthen accountability, reporting and assurance processes giving leaders confidence that controls remain effective as systems evolve.

Our dedicated health, safety and digital team is equipped to help you move from uncertainty to action by identifying immediate issues, strengthening governance and embedding practical controls across the digital lifecycle, from system selection and design through implementation, change and retirement.

The strategic question is not whether digital work systems are changing work. It is whether governance, oversight and leadership capability are evolving quickly enough to keep pace.

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