

Entry Permit Holder Report

Application ID: 24459305

Entry Permit Holder	
Full Name:	Joshua Karpowicz
Permit Number:	ET-24-02260
Union Represented:	Ambulance Employees Association of SA

Worksite Entered	
Business Name:	SA Ambulance Service
Industry:	Other Ambulance Service
Address:	216 Greenhill Road Eastwood SA 5063
Date workplace entered:	01/10/2026

I Joshua Karpowicz am of the opinion that the PCBU has contravened the WHS legislation relating to:

	Suspected Contravention	Summary of suspected contravention, discussions on rectification, and agreed actions with timeframes	Was the contravention rectified?
PCBU Alleged Contravention 1	Inadequate monitoring of the health of workers and the conditions at the workplace	During the entry, SAAS advised that overtime information exists across operational and payroll systems, but there is no integrated or real time monitoring that reliably identifies individual worker exposure, overtime frequency and duration, reasons for overtime, or whether end of shift relief was provided. SAAS also advised that it does not maintain a register monitoring compliance with the End of Shift Relief Procedure. This limits the ability of SAAS to identify repeated and excessive overtime and assess whether fatigue	No

The information and views expressed in this report are those of the Entry Permit Holder. This report is published on the SafeWork SA website in accordance with regulation 28(2)(a) and (b) of the Work Health and Safety Regulations 2012 (SA).

		controls are effective. The SAAS risk register identifies end of shift overtime and delayed or missed meal breaks as causes of fatigued officer deployment. It states that overtime increases staff stress, fatigue and illness, and rates the End of Shift Relief Procedure as only Partially Effective. SAAS cited demand, limited resources and hospital ramping as barriers. No immediate rectification was implemented.	
PCBU Alleged Contravention 2	Not maintaining safe systems of work	The systems of work used by SAAS are not ensuring timely meal breaks. Records inspected showed that approximately 70 percent of metropolitan crib breaks were late or missed, with second breaks particularly affected. SAAS advised that demand and hospital ramping prevent timely breaks. The current system does not provide an effective break while workers remain responsible for ramped patients. Reports provided to SAAS include members completing an entire shift with no crib breaks, members missing both breaks while ramped and awaiting relief, and members on 30 August 2026 experiencing more than seven hours of hospital ramping without a second break. The SAAS risk register identifies delayed or missed breaks as a cause of fatigued officer deployment and rates the Crib Breaks Procedure as only Partially Effective. SAAS agreed to review the procedure to provide better coverage for ramped workers, but no immediate additional control was implemented.	No
PCBU Alleged Contravention 3	Not maintaining safe systems of work	The systems used by SAAS do not prevent frequent or unreasonable post shift overtime. SAAS data shows metropolitan post shift overtime remained persistently high over the 12 months to September 2026, averaging about 230 hours per month and reaching 311.2 hours in August 2026. Payroll data records about 282000 dollars in metropolitan post shift overtime expenditure in July 2026 alone. Reports describe repeated relief requests without timely plans and members continuing safety critical work while fatigued. On 20 September 2026, Norwood members finished three hours after rostered end without a second meal break. The members reported being extremely fatigued, and one used sick leave for the next shift because the member was too fatigued to attend work. SAAS cited	No

		demand, limited crews and ramping as barriers. The SAAS risk register rates the End of Shift Relief Procedure as only Partially Effective. SAAS stated that controls would be reviewed, but no immediate controls were implemented.	
PCBU Alleged Contravention 4	Lack of information, training, instruction or supervision	There were limited metropolitan incident reports for missed or late meal breaks, overtime, workload and fatigue. This does not reflect SAAS operational data or reports received by the AEA. Examples provided to SAAS include members completing an entire shift without a meal break, more than seven hours of ramping without a second break, workers finishing about three hours late without a second break, and a member unable to attend the next shift because the member was too fatigued to attend work. Despite this, SAAS produced comparatively few metropolitan WHS incident reports concerning these hazards. This is inconsistent with the statement in the SAAS risk register that a strong reporting culture exists. The reporting control is rated only Partially Effective. In my opinion, workers and supervisors have not received adequate information, training, instruction or supervision about when these hazards must be reported and escalated. No immediate rectification was agreed.	No
PCBU Alleged Contravention 5	Lack of information, training, instruction or supervision	Reports reviewed indicate that the End of Shift Relief Procedure and Crib Breaks Procedure are not consistently applied. On 27 August 2026, members in the Barossa were stood down for a seventh hour meal break but were then dispatched to two incidents outside the stand down criteria. Their first meal break began at 1710 despite an 1800 finish. No welfare check was reported. Other reports describe repeated relief requests without timely action and available crews being directed elsewhere rather than providing end of shift relief. The SAAS risk register rates both procedures as only Partially Effective. SAAS did not demonstrate that targeted training, assurance or supervision has occurred for either procedure. SAAS stated that the circumstances raised would be reviewed but could not explain why the procedures were not followed. No immediate training or supervisory control was implemented.	No

PCBU Alleged Contravention 6	Inadequate facilities or access to facilities	SAAS has not ensured reliable 24-hour access to suitable nutrition for ambulance workers delayed at hospitals over meal periods. During the entry, SAAS acknowledged that 24-hour food access is unavailable across the majority of metropolitan hospitals where ramping occurs, including Lyell McEwin Hospital, Flinders Medical Centre and The Queen Elizabeth Hospital. This is particularly concerning because workers remain responsible for ramped patients for extended periods and are unable to be released for their meal breaks. Reports include members ramped for more than seven hours without a second meal break, members completing an entire shift without a break, and members continuing into significant overtime without a second break. Workers therefore have neither access to a timely break nor suitable nutrition while performing safety-critical work. Options such as food vending machines for ramped workers remain under consideration but not universally implemented. No immediate rectification or	No
PCBU Alleged Contravention 7	Not maintaining a safe work environment	Workers remain exposed to cumulative fatigue and psychosocial risk from sustained workload, missed or delayed meal breaks, unscheduled overtime, limited job control and prolonged hospital ramping. Reports to SAAS include entire shifts without a meal break, more than seven hours ramped without a second break, missed breaks across consecutive shifts, and workers finishing three hours late without a second break. In the latter case, a member described both workers as extremely fatigued and later used sick leave because the member was too fatigued to attend work. The SAAS risk register identifies missed breaks and end of shift overtime as causes of fatigued officer deployment. It states that overtime increases staff stress, fatigue and illness. It also states that fatigue affected decisions increase the likelihood of injury, illness and legislative non compliance. Relevant controls are rated Partially Effective. No immediate additional control was implemented.	No
PCBU Alleged Contravention 8	Not maintaining safe systems of work	The End of Shift Relief Procedure does not effectively prevent overtime for workers ramped near EOS. SAAS acknowledged that waiting until EOS to arrange relief	No

		contributes to overtime, as workers must still complete handover, return to station, clean, restock and document. On 24 July 2026, members at Noarlunga requested relief at 0130 for a 0200 finish. No relief plan existed at 0200 and the relieving crew was only sent after 0240. On 28 July, members at QEH requested relief before a 0600 finish, but relief occurred about 0730 after nearby crews were reportedly sent to Priority 2 cases. Another report states that two crews offered relief at FMC, but EOC declined because it was not policy for crews to receive relief until the end of shift. The SAAS risk register rates the procedure Partially Effective. The AEA sought improved controls and a review on 3 August 2026. SAAS stated that the controls would be reviewed, but no immediate controls were implemented.	
--	--	--	--

Summary of matters that remain unresolved:

The matters remain unresolved. Workers continue to experience recurring post-shift overtime, delayed EOS relief, late or missed meal breaks and fatigue, particularly while ramped at hospitals. Ramped crews may remain responsible for patients over meal periods without reliable access to a meal break or suitable 24-hour nutrition. The EOS Relief Procedure does not reliably provide relief before rostered finish times, and SAAS has not implemented effective real-time monitoring of individual or cumulative overtime exposure. Adequate training and instruction for workers and supervisors on formally reporting and escalating excessive overtime, missed or late breaks, workload and fatigue has not occurred, and no training plan was identified during the entry. SAAS stated it would review its controls, but no immediate controls, interim measures or implementation timeframes were confirmed.