Work Health and Safety (Managing Psychosocial Hazards at Work Code of Practice) Approval 2023

Notifiable instrument NI2023-482

made under the

Work Health and Safety Act 2011, section 274 (Approved Codes of Practice)

1 Name of instrument

This instrument is the Work Health and Safety (Managing Psychosocial Hazards at Work Code of Practice) Approval 2023.

2 Commencement

This instrument commences on 27 November 2023.

3 Code of Practice Approval

Under section 274 of the *Work Health and Safety Act 2011* (the Act) and being satisfied that this code of practice was developed by a process described in s274 (2) of the Act, I approve the attached Managing Psychosocial Hazards at Work Code of Practice.

Mick Gentleman Minister for Industrial Relations and Workplace Safety 22/8/2023



Managing Psychosocial Hazards at Work

Code of Practice

August 2023

Disclaimer

This code is based on a national model code of practice developed by Safe Work Australia under the national harmonisation of work health and safety legislation and material developed by WorkSafe QLD in the Managing the risk of psychosocial hazards at work Code of Practice, adapted for the ACT and has been approved under section 274 of the Work Health and Safety Act 2011 (ACT), following the legislated consultation.

This code of practice commenced in the Australian Capital Territory on the date it was published on the ACT Legislation Register.

Safe Work Australia is an Australian Government statutory agency established in 2009. Safe Work Australia includes Members from the Commonwealth, and each state and territory, Members representing the interests of workers and Members representing the interests of employers.

Safe Work Australia works with the Commonwealth, state and territory governments to improve work health and safety and workers' compensation arrangements. Safe Work Australia is a national policy body, not a regulator of work health and safety. The Commonwealth, states and territories have responsibility for regulating and enforcing work health and safety laws in their jurisdiction.

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Foreword

This code of practice on managing psychosocial hazards at work is an approved code of practice under section 274 of the *Work Health and Safety Act* (the WHS Act).

An approved code of practice provides practical guidance on how to achieve the standards of work health and safety (WHS) required under the WHS Act and the <u>Work Health and Safety</u> <u>Regulation</u> (the WHS Regulation), and effective ways to identify and manage risks.

A code of practice can assist anyone who has a duty of care in the circumstances described in the code of practice. Following an approved code of practice will assist the duty holder to achieve compliance with the health and safety duties in the WHS Act and WHS Regulation, in relation to the subject matter of the code of practice. Like regulations, codes of practice deal with particular issues and may not cover all relevant hazards or risks. The health and safety duties require duty holders to consider all risks associated with work, not only those for which regulations and codes of practice exist.

Codes of practice are admissible in court proceedings under the WHS Act and WHS Regulation. Courts may regard a code of practice as evidence of what is known about a hazard, risk, risk assessment or risk control and may rely on the code in determining what is reasonably practicable in the circumstances to which the code of practice relates. For further information see the Safe Work Australia Interpretive Guideline: The meaning of 'reasonably practicable'.

Compliance with the WHS Act and WHS Regulation may be achieved by following another method if it provides an equivalent or higher standard of WHS than the code.

An inspector may refer to an approved code of practice when issuing an improvement or prohibition notice.

Scope and application

This Code is intended to be read by a person conducting a business or undertaking (PCBU). It provides practical guidance to PCBUs on how to manage psychosocial health and safety risks at work.

This Code may be a useful reference for other persons interested in the duties under the WHS Act and WHS Regulation.

This Code applies to the performance of work and to all workplaces covered by the WHS Act.

How to use this code of practice

This Code includes references to the legal requirements under the WHS Act and WHS Regulation. These are included for convenience only and should not be relied on in place of the full text of the WHS Act or WHS Regulation. Codes of practice do not create new WHS duties, nor do they extend any existing duties, rather they explain how a PCBU may meet those duties.

The words 'must', 'requires' or 'mandatory' indicate a legal requirement exists and must be complied with.

The word 'should' is used in this Code to indicate a recommended course of action, while 'may' is used to indicate an optional course of action.

1. Introduction

The <u>Work Health and Safety ACT 2011</u> (WHS Act) defines 'health' as both physical and psychological health. This means that where the WHS Act imposes a duty in relation to 'health', PCBUs must manage risks to both physical and psychological health, so far as is reasonably practicable.

When psychosocial hazards are not effectively identified there can be an increased risk of psychological and physical harm. On average, work-related psychological injuries have longer recovery times, higher costs, and require more time away from work. Managing the risks associated with psychosocial hazards not only protects workers, but it also decreases the disruption caused by incidents, errors, staff turnover and absenteeism, and may improve broader organisational performance and productivity.

Risks to psychological health are known as *psychosocial risks*. The WHS Regulation defines psychosocial risks as a risk to the health and safety of a worker or other person from a psychosocial hazard.

Psychological health occurs on a continuum of responses which workers may experience, with harm occurring at one end of this continuum – see **Figure 1**. An individual's experience may move back and/or forward on this continuum over time. Experiences may include:

- psychological health a state of wellbeing in which individuals realise their own potential, can cope with the normal stresses of life, can work productively and are able to make a contribution to their community
- reacting in a normative way to negative work events which does not constitute harm
- struggling with exposure to psychosocial hazards, where changes can be made to prevent harm; and
- psychological injury, where harm is evident.¹

Figure 1: Continuum of psychological health



¹ A psychological injury is a disorder or illness that includes a range of recognised cognitive, emotional, physical and behavioural symptoms. These may be short term or occur over many months or years, can significantly affect how a person feels, thinks, behaves, interacts with others, and may impact their work performance.

1.1 Psychosocial hazards at work

WHS Regulation, section 55A

Meaning of psychosocial hazard

Psychosocial hazards at work are hazards that:

- arise from or in relation to:
 - o the design or management of work
 - o the working environment
 - o plant2 at a workplace; or
 - o workplace interactions or behaviors; and
- may cause psychological and physical harm.

Psychosocial hazards and appropriate control measures may vary between workplaces and between groups of workers, depending on the work environment, organisational context and the nature of work.

Workers are likely to be exposed to a combination of psychosocial hazards, some hazards may always be present, while others may be occasional or a single exposure. Common psychological hazards that arise from, or are related to, work may include:



Psychosocial hazards that may arise at work

- Job demands
- Low job control
- Poor support
- Lack of role clarity
- Poor organisational change management
- Inadequate reward and recognition
- Poor organisational justice
- Traumatic events or material

- · Remote or isolated work
- Poor physical environment
- · Violence and aggression
- Bullying
- Harassment including sexual harassment
- Conflict or poor workplace relationships and interactions

Appendix A Job characteristics, design and management and Appendix B Harmful behaviours provide further guidance and examples for each hazard.

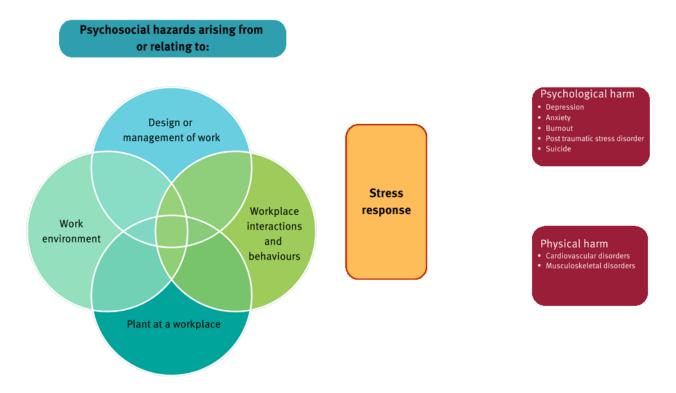
Psychological harm or injuries from psychosocial hazards include conditions such as anxiety, depression, post-traumatic stress disorder (PTSD), and sleep disorders. Physical injuries from psychosocial hazards include musculoskeletal injury, chronic disease, and physical injury following fatigue and error related workplace incidents.

As shown in **Figure 2**, psychosocial hazards can create harm through a worker's experience of a frequent, prolonged and/or severe stress response, where stress is defined as a person's psychological response (e.g. anxiety, tension) and physiological response (e.g. release of

² WHS laws use the term plant to describe machinery, equipment, appliances, containers, implements and tools, any part of those things or anything fitted or connected to those things.

stress hormones, cardiovascular response) to work demands or threats. For example, workers will be impacted differently by occurrences of violence.

Figure 2: Relationship between psychosocial hazards and injury outcomes



How do psychosocial hazards cause harm?

Psychosocial hazards can create stress. Stress is the body's reaction when a worker perceives the demands of their work exceed their ability or resources to cope.

Stress creates a physiological and psychological response in the body by releasing adrenaline and cortisol, raising the heart rate and blood pressure, boosting glucose levels in the bloodstream and diverting energy from the immune system to other areas of the body.

Stress itself is not an injury but if it becomes frequent, prolonged or severe it can cause psychological and physical harm.

Some hazards cause stress when a worker is exposed to the risk of that hazard occurring, as well as when they are directly exposed to the hazard itself. For example, workers exposed to workplace violence are likely to experience stress if they perceive that the risk has not been controlled, even if the violence does not occur again. In this situation, despite the hazard rarely occurring, the stress itself may be prolonged.

1.2 Work health and safety duties

PERSONS CONDUCTING A BUSINESS OR UNDERTAKING

WHS Act, section 19

Primary duty of care

WHS Regulation, division 11 [new division]

Psychosocial risks

WHS Regulation, Part 3.1

Managing risks to health and safety

A PCBU must ensure, so far as is reasonably practicable, workers and other persons are not exposed to risks to their psychological or physical health and safety. A PCBU must eliminate psychosocial risks in the workplace, or if that is not reasonably practicable, minimise these risks so far as is reasonably practicable.

A PCBU must manage psychosocial risks in accordance with Part 3.1 of the WHS Regulation.

Under the WHS Regulation, to manage psychosocial risks, a duty holder must:

- identify reasonably foreseeable hazards that could give rise to psychosocial risks
- eliminate risks, so far as is reasonably practicable
- if it is not reasonably practicable to eliminate the risks minimise the risks so far as is
 reasonably practicable by implementing control measures, and maintain those control
 measures so they remain effective; and
- **review, and if necessary revise**, control measures so as to maintain, so far as is reasonably practicable, a work environment that is without risks to health and safety.

In determining control measures to be implemented, a PCBU must have regard to all relevant matters, 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
 - o 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 behaviors; and
- the information, training, instruction and supervision provided to workers.

Examples of when a PCBU will have a duty to manage psychosocial risks:

- the PCBU engages workers to carry out work
- the PCBU directs or influences workers in carrying out work
- other people may be put at risk from work carried out in their business or undertaking such as visitors, delivery people, clients, patients and their families; and
- the PCBU manages or controls a workplace.

Additional PCBU Obligation

From 9 June 2023 PCBUs must formally notify WorkSafe ACT as soon as they become aware of a sexual assault incident in their workplace, under part 4 of the <u>Workplace Legislation</u> Amendment Act 2022.

For information on notifying WorkSafe ACT visit their website.

PCBU DUTIES - WHAT IS REASONABLY PRACTICABLE?

WHS Act, section 18

What is reasonably practicable in ensuring health and safety

The standard of 'reasonably practicable' in health and safety duties applies to a PCBU. Other duty holders are required to meet different standards, for example officers must exercise 'due diligence' and workers and others at a workplace must take 'reasonable care'.

'Reasonably practicable', in relation to a duty to ensure health and safety, means that which is, or was at a particular time, reasonably able to be done to ensure health and safety, taking into account and weighing up all relevant matters including:

- the likelihood of the hazard or the risk concerned occurring
- the degree of harm that might result from the hazard or the risk
- the availability and suitability of ways to eliminate or minimise the risk
- what the person concerned knows, or ought reasonably to know, about the hazard or risk
 in a code of practice, and about the ways of eliminating or minimising the risk; and
- after assessing the extent of the risk and the available ways of eliminating or minimising
 the risk, the cost associated with available ways of eliminating or minimising the risk,
 including whether the cost is grossly disproportionate to the risk.

In practical terms, this means that all the relevant matters in relation to the hazard and its risk are taken into account and weighed up to achieve a balance that provides the highest level of protection that is possible and reasonable in the circumstances.

The question of what is reasonably practicable is determined objectively (that is, by what a reasonable person in the position of the PCBU would do in the circumstances) - not by reference to a PCBU's capacity to pay or other individual circumstances. A PCBU cannot expose people to a lower level of protection simply because it is in a lesser financial position than another PCBU facing the same hazard or risk in similar circumstances.

Refer to section 4.1 below in this Code for more information about selecting reasonably practicable control measures and considering the cost of control measures.

For further information see the Interpretive Guideline: The meaning of 'reasonably practicable'.

OFFICERS

WHS Act, section 27

Duty of officers

Officers of a PCBU (such as company directors) have a duty to exercise due diligence to ensure the PCBU complies with its duties under the WHS Act and WHS Regulation. For psychosocial risks this means the officer must take reasonable steps to:

- acquire and keep up-to-date knowledge of psychosocial work health and safety matters
- gain an understanding of the nature of the operations of the business or undertaking of the PCBU and generally of the psychosocial hazards and risks associated with those operations
- ensure the PCBU has available for use, and uses, appropriate resources and processes to eliminate or minimise psychosocial risks from work carried out by the business or undertaking
- ensure the PCBU has appropriate processes for receiving and considering information regarding incidents, psychosocial hazards and risks to health and safety and responding in a timely way to that information
- ensure the PCBU has, and implements, processes for complying with any duty or obligation they have under the WHS Act and WHS Regulation; and
- verify the provision and use of the resources and processes mentioned above and that they are performing effectively.

The role and influence a person has within an organisation will determine whether or not they are an officer under the WHS Act and WHS Regulation, for example, some senior managers or executives may be officers under the WHS laws. For more information on who is an officer and their duties see the Safe Work Australia Interpretive Guideline: <u>The health and safety duty of an officer under section 27</u> and Information Sheet on who is an officer.

WORKERS

WHS Act, section 28

Duties of workers

Workers must take reasonable care for their own psychological and physical health and safety and to not adversely affect the health and safety of other persons. Workers must comply with reasonable health and safety instructions, as far as they are reasonably able, and co-operate with reasonable health and safety policies or procedures that have been notified to workers.

For example, workers must follow any notified workplace policies setting standards for appropriate behavior aimed at preventing bullying and harassment.

A worker is entitled to cease or refuse to carry out work if the worker has a reasonable concern that carrying out the work would expose them to a serious risk to their health or safety, arising from an immediate or imminent exposure to a hazard, refer section 84 of the WHS Act. A worker who has ceased work must notify the PCBU that they have ceased work and remain available to carry out suitable alternative work until it is safe for them to resume normal duties, refer sections 86-87 of the WHS Act.

A person is a worker if the person carries out work in any capacity for a PCBU including work as an employee, a contractor or sub-contractor or their employees, a labour hire worker, an outworker, an apprentice or trainee, a work experience student, or a volunteer.

Note: Workers should notify a supervisor if they identify a psychosocial hazard or if they are unclear about how to perform their role safely without risk to their health. If workers are concerned about risk to their health and safety from exposure to psychosocial hazards, they can raise these issues with their PCBU and discuss the matter with a health and safety representative (HSR) (if there is one for the work group) or a member of the health and safety committee (if there is one at their workplace).

OTHER PERSONS IN THE WORKPLACE

WHS Act, section 29

Duties of other persons at the workplace

Other persons at the workplace, like visitors, must take reasonable care for their own psychological and physical health and safety and must take reasonable care not to adversely affect other people's health and safety. They must comply, so far as they are reasonably able, with reasonable instructions given by the PCBU to allow them to comply with the WHS Act and WHS Regulation.

For example, a customer in a retail store must not behave violently, nor abuse or harass staff.

Other persons may be persons such as visitors, delivery people, customers, clients, patients and their families.

Example 1: Visitors must obey policies and procedures, such as: don't jump barriers, follow safety signs, and follow reasonable instruction when being provided a service or engaging in an activity.

Example 2: Visitors and others at a workplace must comply with any reasonable behavioural standards instructed by a PCBU, and adhere, so far as reasonably able, to site rules and procedures. This includes standards from the PCBU regarding prohibitions on violence and aggression, bullying and sexual harassment.

OTHER RELEVANT DUTIES

Other relevant duties under WHS laws are set out throughout this Code of Practice. Also see the Consultation, Cooperation and Coordination Code of Practice.

WHS laws do not operate in isolation and other laws may also apply. For example:

- Industrial relations: pay and contracts, disciplinary processes, termination
- Criminal: sexual assault, personal violence, property damage, stalking
- Anti-discrimination: being treated differently in the workplace because of your protected attributes; and
- Privacy and workers' compensation laws.

1.3 Consultation CONSULTING WORKERS

WHS Act, section 47

Duty to consult workers

A PCBU must consult, so far as is reasonably practicable, with workers who carry out work for the business or undertaking and who are (or are likely to be) directly affected by a WHS matter.

If you and your workers have agreed procedures for consultation, it must be conducted in accordance with those procedures.

Effective consultation with workers improves decision-making about health and safety matters and assists in reducing work-related injuries and illness. Workers can identify tasks or aspects of their work that cause or expose them to psychosocial hazards and may have practical suggestions or potential solutions to address those hazards. For example, workers may have ideas to improve work design to minimise the risks of psychological harm.

The definition of 'worker' under the WHS Act is broad. In addition to employees, it includes anyone working for the business or undertaking, including contractors and their employees, labour-hire workers, outworkers, apprentices, trainees, work experience students and volunteers.

Some examples of common scenarios where workers may be affected by psychosocial hazards include:

- health care workers working directly with patients who may exhibit violent or aggressive behaviour
- workers affected by an organisational change (e.g. a merger or acquisition) where workers may experience poor change management or a lack of role clarity
- call centre workers during, or following, a natural disaster; and
- shift workers, or workers who work in remote or isolated circumstances, who may be exposed to social isolation, violent behaviour or sexual harassment.

PCBUs must consult with workers when assessing risks or making decisions about what control measures should be used to protect against psychosocial risks.

Workers from diverse backgrounds may be exposed to different psychosocial hazards. For example, women, young workers, those from culturally and linguistically diverse (CALD) backgrounds, Aboriginal and Torres Strait Islander workers, LGBTIQ+ workers and workers with disability. PCBUs must consult with all workers so far as is reasonably practicable. Vulnerable workers are more likely to be exposed to psychosocial hazards, which increases their risk of workplace sexual harassment, bullying and violence.

WHS Act. section 48

Nature of consultation

All consultation must include any Health and Safety Representatives (HSRs) representing workers. References to consultation with workers in this Code includes consultation with any HSRs. When conducting consultation, it is also important to recognise that your workers may also be represented by a work-related organisation, for example, a trade union.

PCBUs must provide workers with a reasonable opportunity to raise psychosocial health and safety issues, express their views and contribute to decision-making. PCBUs must consider whether existing consultation arrangements are appropriate for psychosocial risks. PCBUs must also consult with workers and their representatives on implementing new consultation arrangements if required. See further information below regarding consultation on psychosocial hazards.

Management commitment and open communication between managers and workers is important in achieving effective consultation. Workers are more likely to engage in consultation when their knowledge and ideas are actively sought and concerns about psychosocial health and safety are taken seriously. PCBUs should encourage workers to:

- · share their knowledge and experience; and
- report psychosocial hazards so risks can be managed before an injury occurs.

Effective methods of consultation can vary according to the needs of workers, workplace size, worker distribution across sites and shifts, the nature of the work and the type of hazards in a workplace.

You and your workers should agree the form consultation will take. If your workplace has already agreed to procedures for consultation, those procedures must be used. If not, you must first consult with your workers and agree the form that consultation will take.

For example, consultation could include:

- pre-job-start or toolbox discussions
- focus groups
- worker surveys
- WHS committee meetings
- · team meetings; and
- · individual discussions.

Each consultation method has benefits and limitations. For example, some forms of consultation are better for workers who do not have regular access to computers, while others allow workers to raise sensitive issues anonymously, or to provide detail and context.

CALD and Aboriginal and Torres Strait Islander workers may need, or benefit from, different forms of consultation. For example, providing materials and conducting consultation in workers' preferred language(s) and using culturally appropriate people and messages.

Workers may be hesitant to raise and discuss some psychosocial hazards due to privacy or other concerns, particularly in relation to hazards like bullying or sexual harassment. PCBUs should consider consultation processes that address such concerns like anonymous surveys or reporting, particularly where workers may be concerned that raising safety issues could impact on their employment or career progression.

PCBUs may need to use multiple methods of consultation for psychosocial hazards. The form and methods of consultation must be decided in consultation with workers.

To genuinely consult with workers, PCBUs must:

- share relevant information about the matters being consulted on
- give workers a reasonable opportunity to express their views, raise psychosocial risks, psychological health and safety issues and contribute to the decision-making process

- genuinely consider and take the views of works into account before making decisions on health and safety matters; and
- advise workers of the outcome of consultation.

If workers are represented by a HSR, consultation must involve that HSR.

HSRs have a specific role to:

- represent members of their work group in matters relating to work health and safety
- monitor the measures taken by the PCBU or their representative to comply with the WHS Act in relation to workers in their work group
- investigate complaints from members of the work group relating to work health and safety; and
- inquire into anything that appears to be a risk to the health or safety of workers in their work group, arising from the conduct of the business or undertaking.

HSRs have a critical role not only in raising and helping to resolve issues on behalf of their work group, but also in reviewing processes following an incident.

WHS Act, section 49

When consultation is required

As a PCBU you must consult with workers when:

- identifying hazards and assessing risks to health and safety arising from the work carried out or to be carried out
- making decisions about ways to eliminate or minimise those risks
- making decisions about the adequacy of facilities for the welfare of workers
- proposing changes that may affect the health or safety of your workers; and
- making decisions about procedures for consulting with workers; resolving health or safety issues at the workplace; monitoring health of your workers; monitoring the conditions at the workplace under your management or control and providing information and training for your workers.

However, it may be useful to also consult workers about matters not listed above.

Regular consultation is better than consulting only as issues arise on a case-by-case basis, or as a reaction to a particular event, because it allows you to identify and fix potential problems early. This helps to build rapport and a culture of open communication, increasing worker engagement with consultation pieces. Further guidance is available in the Code of Practice: <u>Work health and safety consultation</u>, cooperation and coordination.

Example:

A workplace has a current bullying and harassment policy and it identifies ways for reporting inappropriate behavior.

An incident occurred where a worker experienced verbal and physical aggression from a customer. The worker raised the concern with the workplace.

Duty to consult:

Although the workplace has a policy that may capture some aspects of the incident. The workplace still needs to review the incident and assess the effectiveness of controls regarding work-related violence an aggression. In undertaking this assessment, workers should be consulted on the assessed risk and if the current controls remain effective.

CONSULTING, COOPERATING AND COORDINATING ACTIVITIES WITH OTHER DUTY HOLDERS

WHS Act, section 14

Duties are not transferrable

WHS Act, section 16

More than 1 person can have a duty

WHS Act, section 272

No contracting out

More than one person can have the same WHS duty at the same time. The WHS Act requires that where more than one person has a duty for the same matter, each person retains responsibility to meet their duty in relation to the matter and must do so to the extent to which they can influence and control the matter.

Duty holders cannot transfer their duty to another person or contract out their health and safety duties. Duty holders can make arrangements or agreements with other duty holders to assist with meeting their duties.

WHS Act, section 46

Duty to consult with other duty holders

Duty holders must consult, cooperate and coordinate activities with all other persons who have a WHS duty in relation to the same matter, so far as is reasonably practicable. Where you share a duty (e.g. you share a workplace or are involved in the same activity), each duty holder should:

- exchange information; and
- find out who is doing what about their respective WHS obligations and work together in a cooperative and coordinated way so risks are eliminated or minimised.

Consulting, cooperating and coordinating with other duty holders can help you more easily and effectively control risks, and assist each of you to comply with your duty.

For example, both a PCBU who engages workers through a labour-hire company and the labour-hire company who supplies the workers have WHS duties to ensure the health and safety of the workers. They may consult and cooperate as part of contract negotiations about how to minimise psychosocial hazards, such as high job demands, by agreeing realistic timeframes, and ensuring workers have the skills and support to perform the work. Further guidance is available in the Code of Practice: Work health and safety consultation, cooperation and coordination.

2. Overview of the process to manage psychosocial risks

To meet your duties to ensure health and safety, PCBUs must eliminate or minimise psychosocial risks so far as is reasonably practicable. To achieve this, just as for any other hazard, you can apply the risk management process described in the Code of Practice: <u>How to manage work health and safety risks</u>.



The risk management process involves four steps:

- 1. Identify hazards find out what could cause harm (Chapter 3)
- 2. **Assess risks**, if necessary understand the nature of the harm the hazard could cause, how serious the harm could be and the likelihood of it happening. This step may not be necessary if the risks and controls are known (<u>Chapter 4</u>)
- 3. Control risks implement the most effective control measures that are reasonably practicable in the circumstances and ensure they remain effective over time. This means:
 - a. you must eliminate risks, if reasonably practicable to do so
 - b. if it is not reasonably practicable to eliminate the risks, implement the most effective control measures to minimise the risks so far as is reasonably practicable in the circumstances; and
 - c. ensure those control measures remain effective over time (Chapter 5).
- 4. **Review control measures** to ensure they are working as planned and make changes as required (chapter 6).

All of these steps must be supported by consultation (see <u>Section 1.3</u> of this Code). Some workplace hazards are *foreseeable*, for example when workers are required to engage with the public there is a risk of exposure to bullying and harassment. Other hazards are *known* based on information already accessible to PCBUs such as incident reporting, surveys, and other near misses in the workplace.

Risk management requires planning and is an ongoing process. However, considering risks early prevents costly changes later and allows for more effective control measures to be used, resulting in less harm to workers.

For example, PCBUs should consider psychosocial hazards at the design phase when planning an organisational restructure or undertaking other organisation or work process change. This could include change caused by the COVID-19 pandemic (remote work, isolation, lack of supervision, and low role clarity), business expansion and other change that may increase hazard risk.

The risk management process may be implemented in different ways depending on the size and nature of the business or undertaking. Larger businesses and those in sectors where workers are exposed to more or higher risks are likely to need more complex, sophisticated risk management and consultation processes.

Before PCBUs start the process:

- explain the process
- get commitment and engagement from senior leaders and managers
- identify who needs to be involved, for example managers, workers, HSRs and subject matter experts; and
- decide how the process and its outcomes will be recorded and communicated.

LEADERSHIP AND MANGEMENT COMMITMENTS

Genuine commitment by the PCBU, officers, and other organisational leaders is essential. These leaders, through their governance arrangements and resourcing decisions, actively shape the organisation and the way work is undertaken. These decisions will, directly and indirectly, impact how effectively PCBUs can control psychosocial risks.

This commitment can be built by ensuring leaders understand their duties under WHS laws, the risk management process these require, the business case for effectively managing psychosocial hazards, and the roles of various organisational leaders (e.g. human resources and WHS managers).

CONSULTING WORKERS THROUGH THE RISK MANAGEMENT PROCESS

At each step of the risk management process PCBUs must consult workers who are, or are likely to be, directly affected by a WHS matter and any HSR(s) so far as is reasonably practicable. For example, consult on proposed changes affecting work health and safety such as:

- new policies, procedures and systems of work
- organisational restructures, changes to staffing levels, new reporting arrangements and work locations
- changes to tasks, workload, duties and working arrangements, including rosters
- new technology, plant, equipment, substances, structures and production processes
- the redesign of existing workplaces; or
- changes to the way information, training, instruction and supervision are provided.

Consultation on changes that may affect work health and safety should occur as early as possible. When conducting consultation, it is also important to recognise that your workers may also be represented by a work-related organisation, for example, a trade union.

See <u>Section 1.3</u> for more information on consultation.

Further guidance on the risk management process is available in the Code of Practice: <u>How to manage work health and safety risks.</u>

3.Identify psychosocial hazards

The first step in the risk management process is to identify psychosocial hazards. This involves identifying the aspects of work and situations that could potentially harm workers or others at your workplace and why these may be occurring. This step should also assist PCBUs to identify where and when workers are exposed to psychosocial hazards, and if controls are not adequately eliminating or minimising risks from known hazards.



3.1 Common psychosocial hazards

Below is a list of some examples of common psychosocial hazards you should consider when identifying psychosocial hazards in your organisation. The list and the examples in the descriptions are not exhaustive. Workers are likely to be exposed to a combination of psychosocial hazards; some risks may be constantly present, while others arise sporadically.

Some hazards by themselves may cause serious harm, such as experiencing workplace violence. In most circumstances, it will be a combination of psychosocial hazards which together may cause harm. Harm can be caused by a single instance or over time with repeated or prolonged exposure.

Hazards can be grouped or described in different ways. How they are categorised is less important than ensuring you and your workers have the same understanding of what is happening and how it may be causing harm.

| Hazard | Descriptions | Example |
|-------------|----------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Job demands | Intense or sustained high mental, physical or emotional effort required to do the job. | Michael has just started out at a law firm. His manager told him |
| | Unreasonable or excessive time pressures or role overload. | that the harder he works the more he will benefit at the workplace. His duties are diverse and he has been assigned tasks that are not possible to complete without committing excessive afterhours work. He is worried about making a mistake with his work, as this could have significant |
| | High individual reputational, legal, career, safety or financial risk if mistakes occur. | |
| | High vigilance required, limited margin of error and inadequate systems to prevent individual error. | |
| | Shifts/work hours that do not allow adequate time for sleep and recovery. | consequences for his clients and himself. When Michael raised his |
| | Sustained low levels of physical, mental or emotional effort is required to do the job. | concerns with his manager, the response is 'all of his colleagues are doing excessive afterhours |
| | Long idle periods while high workloads are present, for example where workers need to wait for equipment or other workers. | work also'. |

| Hazard | Descriptions | Example |
|---------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Low job control | Workers have little control over aspects of the work including how or when the job is done. Workers have limited ability to adapt the way they work to changing or new situations. Workers have limited ability to adopt efficiencies in their work. Tightly scripted or machine/computer paced work. Prescriptive processes which do not allow workers to apply their skills and judgement. Levels of autonomy not matched to workers' abilities. | Ollie, a worker at an egg production facility, experiences low job control when grading and packing eggs off a conveyor belt due to the machine paced work. |
| Poor support | Tasks or jobs where workers have inadequate support including practical assistance and emotional support from mangers and colleagues, or inadequate training, tools and resources for a task. | Megan is a policy officer working in the public service. She has recently changed teams and is working in a new policy area. Megan is given a list of tasks to complete with no guidance from her supervisor. Megan tries to ask her supervisor for more assistance multiple times but her supervisor keeps saying they are too busy to talk to her about it. |
| Lack of role clarity | Uncertainty, frequent changes, conflicting roles or ambiguous responsibilities and expectations. Differences between 'ways of working' and policy/procedure. | Carlos works at a deli café. He is employed as the barrister in the Café. The two owners of the business share management duties. One of the managers asks Carlos to work behind the counter and package cheese due to staffing shortages. The other manager asks him to continue making the coffee and take orders. Carlos is unsure which jobs he should be doing. |
| Poor organisational change management | Insufficient consultation, consideration of new hazards or performance impacts when planning for, and implementing, change. Insufficient support, information or training during change. Not communicating key information to workers during periods of change. | Fiona works at a call centre. She is told by her supervisor that they are moving to a different office building that week and to pack her things. After moving to her new workplace, she receives no instruction on where the emergency exit and amenities are located. |

| Hazard | Descriptions | Example |
|-----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Inadequate reward and recognition | Jobs with low positive feedback or imbalances between effort and recognition. | Ron works as a car salesperson. Every time he makes a sale his manager comments about how |
| | High level of unconstructive negative feedback from managers or customers. | Ron should be selling more cars. |
| | Low skills development opportunity or underused skills. | |
| Poor organisational justice | Inconsistent, unfair, discriminatory or inequitable management decisions and application of policies, including poor procedural justice. | Rosa works as a campaigner for a community organisation. Her team is small and she is always very busy. A co-worker makes an inappropriate comment to Rosa at work. She raises this with her manager and says she would like to make a report. The manager says their organisation doesn't have a process for reporting the incident and suggests she forget about it. |
| Traumatic events or material | Experiencing fear or extreme risks to the health or safety of themselves or others. | Mark is a case manager for a domestic violence support service. He talks to victims of domestic |
| | Exposure to natural disasters, or seriously injured or deceased persons. | violence on a daily basis, hearing recounts of both physical and sexual assault. |
| | Reading, hearing or seeing accounts of traumatic events, abuse or neglect. | |
| | Supporting victims or investigating traumatic events, abuse or neglect. | |
| Remote or isolated work | Working in locations with long travel times, or where access to help, resources or communications is difficult or limited. | Carol works as an environmental scientist for a consultancy company. Her boss has decided that the team will work from home permanently. Carol lives alone and often spends days at a time not talking to anyone she works with. |
| Poor physical environment | Exposure to unpleasant or hazardous working environments. | Martin works as a labourer. During the summer heatwaves he is still expected to work through the hottest part of the day without breaks. |
| Violence and aggression | Violence, or threats of violence from other workers (including workers of other businesses), customers, patients or clients (including assault). | Andrew is an admin worker at the front desk in the emergency department. Multiple times a day he deals with patients who are aggressive towards him while |
| | Aggressive behavior such as yelling or physical intimidation. | waiting to talk to a nurse. |

| Hazard | Descriptions | Example |
|--------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Bullying | Repeated unreasonable behavior directed towards a worker or group of workers that creates a risk to health and safety. This includes bullying by workers, clients, patients, visitors or others. | Nina works as an assistant in a dental surgery. Every day when given instruction by the dentist at the surgery, she is belittled and told she is doing a terrible job. The dentist raises their voice when speaking to Nina and tells her she should just quit her job. |
| Harassment including sexual harassment | Harassment due to personal characteristics such as age, disability, race, nationality, religion, political affiliation, sex, relationship status, family or carer responsibilities, sexual orientation, gender identity or intersex status. | Cassandra is a traffic controller. She is the only woman working on her construction site. The other workers on site repeatedly make sexist comments to Cassandra and make it difficult for her to do her job. |
| | Sexual harassment - any unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature, in circumstances where a reasonable person, having regard to all the circumstances, would anticipate the possibility that the person harassed would be offended, humiliated or intimidated. | |
| | Harmful behaviour that does not amount to bullying (such as single instances) but creates a risk to health or safety. | |
| Conflict or poor workplace relationships and interactions | Poor workplace relationships or interpersonal conflict between colleagues or from other businesses, clients or customers. Frequent disagreements, disparaging or rude comments, either from one person or multiple people, such as from clients or customers. A worker can be both the subject and the source of this behaviour. Inappropriately excluding a worker from work-related activities. | Lewis is a waiter in a restaurant. He is one of the youngest workers in the team and the other workers are all close friends. Lewis is constantly left out of team meetings and work-related discussions because the other workers don't like him. |

Appendix A and Appendix B provide further examples of these hazards.

FACTORS THAT MAY PUT SOME WORKERS AT HIGH RISK

Like for physical hazards, some workers may be at greater risk from psychosocial hazards. This means there is a greater likelihood or severity of harm for these workers. For example, workers with:

- limited experience in the workplace (e.g. young workers)
- barriers to understanding safety information (e.g. literacy or language)
- perceived barriers to raising safety issues (e.g. power imbalance or stigma such as workers who identify as LQBTIQ+ or a young woman working in a junior role where managers are all men); or
- previous exposure to a hazard.

For example, inexperienced workers may not identify harmful behaviours or have the confidence to report them. PCBUs could address this by providing more detailed induction training and greater support and supervision until they gain experience and understand these hazards.

Consulting workers will assist in identifying any groups who are at greater risk, and whether there are additional reasonably practicable controls PCBUs must implement to eliminate or minimise the risks for these workers. Additionally, some workers may feel uncomfortable engaging in consultation pieces in a group setting, such as those with a disability or from diverse backgrounds.

ADDRESSING RISKS TO INDIVIDUAL WORKERS

It may also be reasonably practicable to accommodate the needs of an individual worker to prevent harm where the worker has disclosed those needs or the PCBU is aware. For example, a worker with an injury or disability may need a quiet work area or different equipment to do their work. As well as making changes for individual workers PCBUs must still eliminate or minimise psychosocial risks for all workers so far as is reasonably practicable.

These changes may include, but are not limited to, changing workload and work hours, the nature of work, the work environment, or support and supervision. Changes would be considered, for example, when developing genuine return to work plans.

3.2 How to identify psychosocial hazards

PCBUs must identify all reasonably foreseeable psychosocial hazards arising from the work carried out by the business or undertaking.

Ensure your process identifies hazards for serious incidents, such as sexual assault or work-related violence.

Examples of psychosocial hazards are included in Appendix A and Appendix B.

Psychosocial hazards can arise from organisation-wide systems, work practices, work environments and workplace behaviors, or they can be specific to a task or job.

CONSULT YOUR WORKERS

PCBUs must consult with workers (see <u>Section 1.3</u> of this Code) when identifying hazards to health and safety arising from the work they carry out or are going to carry out.

If workers are represented by HSRs PCBUs must include them in this consultation. HSRs may have specific training in work health and safety which can assist you to manage risks. HSRs can also provide workers some anonymity which may encourage better engagement on psychosocial hazards.

Workers may use different terms to describe exposure to psychosocial hazards. For example, they might say they feel:

- stressed, burnt-out or emotionally exhausted about their workload
- anxious or scared about talking to or dealing with an aggressive person
- humiliated, degraded or undermined by sexual harassment or discrimination
- angry about policies being applied unfairly
- confused about what their role involves, torn between competing priorities or 'feeling like a failure' for not being able to meet unrealistic expectations; or
- distressed, unable to sleep, or traumatised by exposure to traumatic situations or content.

Good consultation should allow for differences in how workers may describe hazards and seek to identify the underlying cause. You should provide your workers with information to help them understand and recognise psychosocial hazards. For example, WorkSafe ACT's poster on exposure to common psychosocial hazards.

CONSULTING YOUR SUPPLY CHAINS³

A supply chain is a contractual network between an organisation and its suppliers or between agencies to produce and distribute a specific product or provide a service. WHS risks may result from supply chain arrangements, practices, or shared systems. Each PCBU in the supply chain must ensure, so far as is reasonably practicable, the health and safety of all workers that they engage, cause to engage, influence or direct; and must consult all workers that carry out work for them on health and safety issues.

Examples of psychosocial hazards that might arise across supply chains include pressure to:

- deliver services in very tight timeframes which reduce workers' opportunities to rest; or
- delay service delivery for long periods which may increase client aggression.

PCBUs must talk with suppliers, those commissioning their services, or sharing systems to understand each other's needs and identify common psychosocial hazards, risks and controls, and opportunities to improve the health and safety of all workers and other persons affected by the activities in the supply chain. For further advice, see the Code of Practice <u>Work health and safety consultation, cooperation and coordination.</u>

Outsourcing, contracting, partner and procurement arrangements

Outsourcing, contracting, partner and procurement arrangements will affect how work is done and may create psychosocial hazards for workers in organisations involved in this supply chain and others such as contractors or suppliers. The PCBUs must ensure, so far as is reasonably practicable, that their own workers and others health and safety, such as suppliers and contractors are not put at risk by the arrangements.

Duty holders affected by the outsourcing, contracting and procurement must be consulted on clear arrangements made on how the shared duty to protect and promote the health, safety and well-being of workers will be managed by each duty holder.

USE SURVEYS AND TOOLS

PCBUs can use surveys to gather information from workers, HSRs, supervisors and managers. Surveys are particularly useful when:

- anonymity is important, this is because anonymous surveys or tools protect workers from stigma or other adverse outcomes when reporting hazards or concerns
- workers are physically dispersed, for example, they work across multiples sites or shifts
- you need to consult with a large number of workers to identify organisation-wide hazards
- workers need time to consider your questions and their response; or

³ The source for "consulting your supply chains" is the SafeWork NSW Code of Practice for Managing Psychosocial Hazards at Work, published May 2021, owned by the Department of Customer Service, NSW Government.

 workers may struggle to understand or otherwise participate in other forms of consultation.

Unless agreed with workers, surveys must not replace agreed consultation procedures, however they can be used as an additional tool for consultation.

You can seek advice on the tools available from the WHS regulator, industry associations, unions, technical specialists and safety consultants.

Medium to large businesses or organisations, particularly those with high psychosocial risks, should consider implementing a validated psychosocial risk assessment process (see section 4.2 How to assess psychosocial risks).

OBSERVE WORK AND BEHAVIOURS

Psychosocial hazards may be identified by observing:

- the workplace (e.g. are workers isolated or exposed to poor conditions)
- the work and how work is performed in practice (e.g. are workers rushed, is work delayed, do certain tasks result in confusion or frequent mistakes); and
- how people interact with each other (e.g. are workers, customers and clients respectful, or are harmful behaviors present).

In some circumstances, poor workplace behaviors may be an inappropriate response to other psychosocial hazards, such as high job demands, lack of role clarity and inadequate support. Also consider whether the workplace culture supports or tolerates harmful behaviors, including name-calling, teasing, sexual or gendered jokes, dark humour, and crude language.

REVIEW AVALIABLE INFORMATION

Review relevant information and records which may include:

- records of injuries, incidents or workers' compensation
- worker complaints and investigations
- reports from workplace inspections (e.g. HSR or safety officer walk arounds)
- staffing, resourcing, procurement and refurbishment decisions (e.g. will outsourcing some work increase work demands for another area, like contract managers)
- work systems, policies, governance arrangements and procedures
- duty statements and performance agreements
- records of hours worked (e.g. regular extra hours indicating high work demand)
- absenteeism and turnover data
- exit interviews
- Health and Safety Committee (HSC) meeting records; and
- previous psychosocial risk assessments and any material feeding into them.

Not all psychosocial hazards will be associated with reported incidents, so it is important to gather additional information. For examples of what to look for please see the below table.

| Data Source | What to look for | |
|------------------|------------------------------------------------------------------|--|
| Records of leave | Look for: | |
| | increasing rates of unplanned leave for the work unit, region or | |

| Data Source | What to look for |
|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | department compared to the whole organisation |
| | types of leave in summary information and frequency data; and |
| | excessive unused recreation leave balances or patterns of use such as frequently taking unplanned leave which could be associated with unpleasant working conditions and work-related stress. |
| Hours of work | Look for any data related to planned hours of work, actual hours of work that may cause fatigue, excessive overtime, shifts that are not well managed, or not taking rest breaks during shifts. |
| Workers | Look for: |
| compensation claims | patterns and trends recorded for workers' compensation claims that can provide information about psychosocial hazards and risks in a workplace |
| | increasing rates of psychological injury claims and/or increased severity of psychological injury claims; and |
| | mechanisms of injury associated with psychological injury claims, return to work data, and the actions taken in the workplace to prevent further injury or illness. |
| Grievance information | Look for records in relation to grievances at work that indicate conflict, organisational injustice, lack of role clarity, harassment, discrimination, work-related violence and aggression, and work-related bullying. |
| Incident and Injury records | Look for dates and times that coincide with other events or trends. The pattern of small and large incidents can provide insight into psychosocial hazards. Incidents may be internal or external and include security incidents or records of police attendance. |
| Employee assistance program | Look for summary data such as program usage or types of issues managed which can indicate either positive or negative trends (e.g. proportion of work-related reasons for referral compared to personal reasons for referral, number of referrals citing work-related stress, work-related bullying, or exposure to critical events as the presenting problem). Where possible, compare with employee assistance trends in similar industries. |
| Industrial relations records | Look for records of industrial relations disputes which could be associated with psychosocial hazards that are not managed or controlled effectively and indicate levels of job satisfaction in the workplace. |
| Minutes of meetings | Look for unresolved and reappearing worker issues over time, such as workload and changes in work roles. This can be done by reviewing previous minutes from work health and safety meetings, toolbox talks and staff meetings. |
| Issue resolution records | Look for work health and safety issues involving psychosocial hazards such as work-related bullying, harassment, incidents, and stress reports. |
| Workplace | Look for worker dissatisfaction regarding: |
| surveys | leadership or management styles |
| | management of conflict at work |
| | reward and recognition of effort (e.g. remuneration and career opportunities) |
| | • job security |

| Data Source | What to look for |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
| | working conditions and work schedule |
| | consultation |
| | communication and involvement in decision making |
| | role clarity and control over workload; and |
| | levels of support, social or physical isolation. |
| Turnover data | Look for: |
| (including exit surveys or | data that shows higher than normal turnover rates; and |
| interviews) | reasons for leaving that include workload, lack of support or the mention of any bullying, conflict or organisational injustice. |
| Recruitment | Look for: |
| | the difficulty or ease with which new workers can be recruited |
| | the time taken to hire compared to industry averages (keeping in mind that for some specialist roles recruitment can be more difficult); and |
| | any reviews posted by current or former workers on organisation review websites that mention workload, bullying or support. |
| Local crime statistics | Look for data about frequency and severity of risk of violence in the local community. |

Information and advice about psychosocial hazards and risks relevant to particular industries and work activities are available from the WHS regulator, industry associations, unions, technical specialists, similar workplaces and safety consultants. Advice is particularly helpful in complex or high-risk situations. For example, where workers are exposed to violence or aggression from a person they owe a duty of care to, such as nurses or teachers.

LOOK FOR TRENDS

You may be able to identify trends from the information you collect. Trends may show certain tasks have more hazards associated with them, or some hazards are more common in certain roles. Trends may show workers in a particular location are exposed to more hazards than in other areas, which may indicate a problem with the design of that work area or the way work is carried out there. This can inform your risk assessment.

HAVE A REPORTING MECHANISM AND ENCOURAGE REPORTING

You should establish a mechanism for workers to report hazards. This should protect the privacy of workers who make reports and allow for anonymous reporting where possible. Your reporting mechanism should suit your business size and circumstances and be proportional to the risks in your business. For example, a small café could have a board in the kitchen for workers to write up hazards they identify, a locked box for making confidential reports and the duty manager taking reports of any hazards posing an immediate risk.

If reporting systems are not being used PCBUs need to find out why this could be occurring and ensure that it not due to under reporting or other barriers. Having a reporting system in place that is never used is not an effective control. PCBUs should consider what can be done to encourage reporting, for example providing an alternative person to report to.

There are various ways workers may report or raise psychosocial hazards, including:

discussions with supervisors

- incident report forms
- emails or text messages
- advising their HSR(s), WHS Committee, and/or union representatives
- · letters of complaint or grievance
- · medical certificates; or
- · workers' compensation claims.

Individual workers may report or raise psychosocial hazards directly with management or with their HSRs who can raise issues on behalf of the work group.

Early reporting of psychosocial hazards is encouraged so hazards can be managed before they cause harm.

When hazards aren't being reported

Workers might not report psychosocial hazards because they:

- see them as just 'part of the job' or the work culture
- believe it's not serious enough to report
- feel they do not have time to report frequently occurring hazards
- think reports will be ignored, or not handled respectfully and confidentially
- fear they will be blamed or believe reporting may expose them to additional harm, discrimination or disadvantage; or
- do not know or understand how to report a hazard.

If a worker is being bullied, harassed or is exposed to other harmful behaviours they might not report it when the other person is in a position of authority (e.g. a manager or supervisor) or a position of influence (e.g. a client). Workers may be worried about the consequences of reporting, such as the person finding out about the complaint and the behaviour escalating.

Principles that can be applied, so far as is reasonably practicable, when responding to complaints, incidents or reports involving psychosocial hazards are set out in the below table.

| Principles | Response |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Act promptly | Respond to reports, complaints, or incidents quickly, reasonably and within established timelines. Advise relevant parties how long it will likely take to respond. Keep them informed of progress to provide reassurance the report has not been forgotten or ignored. |
| Ensure immediate safety | Take steps to eliminate or minimise ongoing exposure to hazards and to provide immediate support so far as reasonably practicable. |
| Treat all matters seriously | Take reports, complaints and incidents seriously and assess them on their merits and facts. |
| Use a trauma- informed approach | The concept of a trauma-informed approach means that workplace systems recognise and acknowledge that workplace responses or investigations of reports about psychosocial hazards can escalate or deescalate distress in those with a history of trauma. |
| | In practical terms this means PCBUs who provide services to client groups who may foreseeably have a history of trauma can integrate knowledge |

| Principles | Response |
|----------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | |
| | about trauma into policies, procedures and practices, especially complaint handling procedures and practices. This can include principles of: safety, both physical and emotional (e.g. is the environment and are the processes welcoming? do workplace processes consider the emotional safety and wellbeing of affected individuals? or is the environment/ process likely to distress someone with a history of trauma?) trust (e.g. are the processes sensitive to people's needs, empowering to affected individuals, offering some flexibility and/or opportunity for choice where reasonably practicable? are workers supported to make informed choices, given timely information about the process/their rights?) equity and respect (e.g. do the processes ensure interpersonal respect, acknowledge diversity in all its forms, are they inclusive?) |
| | hope (e.g. do processes assume optimism and the possibility of recovery/resolution?). |
| Maintain | Maintain the confidentiality of all parties involved or be very clear if there |
| confidentiality | are any limits to confidentiality (e.g. if there are concerns about the safety of others). As a general rule, details of the matter should only be known by those directly concerned in the complaint or in resolving it and sensitive and personal information should be protected. |
| Be neutral | Impartiality towards everyone involved is critical. This includes the way people are treated throughout the process and ensuring all parties are able to provide their side of the story. The person responding to the report, complaint or incident should not have been directly involved and personal or professional bias is to be avoided. If this is not possible, consider engaging an external party to ensure impartiality. |
| Support all parties | Once a report or complaint has been made, or an incident has occurred, advise parties involved what support is available, for example employee assistance programs, and allow a support person to be present throughout the process including at interviews or meetings (e.g. an HSR, union representative or work colleague). Ensure adequate and fair support is available to all parties, including those who may be away from work during investigations or during disciplinary processes. This includes both the complainant and the person who the complaint has been made about. Support should also continue following completion of the incident investigation process. |
| Do not victimise | It is important to ensure anyone who reports a psychosocial hazard, or is a |
| | party to a report, complaint or incident is protected from victimisation. |
| Communicate process and outcomes | Inform all parties of the process, any rights and obligations that may apply, how long it is estimated to take and what they can expect will happen during and at the end of the process, including rights of appeal and review. Should the process be delayed for any reason, advise parties of the delay and when the process is expected to resume. Reasons for actions that have been taken or not taken should be explained to the parties wherever possible so that the processes and outcomes are transparent. |
| | Wherever possible, an educative approach should be used. Where persons are away from the workplace (e.g. they are unwell or have been stood down from their roles during investigation processes), ensure an appropriate mechanism for communication is still available. |
| Keep records | Keeping a record of the following information will be useful: |
| | the person who made the reportwhen the report was made |

| Principles | Response |
|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | who the report was made to the details of the issue reported action taken to respond to the issue; and any further action required – what, when and by whom. |

It is important for hazards reported by workers to be taken seriously. Workers can be encouraged to report hazards by:

- treating all reports of psychosocial hazards seriously, appropriately and confidentially
- using agreed mechanisms, such as HSRs who can raise safety concerns for workers anonymously
- regularly discussing psychosocial hazards at team meetings or toolbox talks
- providing workers with a range of accessible and user-friendly ways to make a report informally, formally, anonymously or confidentially
- making it clear that victimising those who make reports will not be tolerated
- training key workers (e.g. supervisors, managers, contact persons and HSRs)
- providing regular updates to workers on the progress undertaken to address the concern
- ensuring processes and systems for reporting and responding to complaints of bullying, sexual harassment or other inappropriate behaviours are suitable, transparent and well understood; and
- acting decisively to control the risks your workers identify.

4. Assess the risks

4.1 When should a risk assessment be conducted?

Once you have identified psychosocial hazards in your workplace, the next step is to assess the risks they create. This will help you determine what is reasonably practicable in managing the risks.

You should carry out a risk assessment, in consultation with workers and their HSRs if they have them, for any hazards you have identified.



A risk assessment can help you determine how severe risks are, and therefore what is reasonably practicable in managing the risks. A risk register is a simple tool that can be used to capture workplace risk management steps, see $\underline{\mathsf{Appendix}\;\mathsf{C}}$.

Further information on risk assessments is available in the Code of Practice: <u>How to manage work</u> health and safety risks.

WHEN TO DO A RISK ASSESSMENT

A risk assessment (or multiple/dynamic risk assessments) should be carried out for any psychosocial hazards that have been identified where the risk of the hazard(s), or accepted control measures, are not well-known. This includes where there is uncertainty about the:

- likelihood or severity of consequences
- how a psychosocial hazard may result in injury or illness
- how psychosocial hazards may interact or combine to create new or greater risks
- · how changes at work may impact the effectiveness of control measures; or
- ways of eliminating or minimising the risk.

Example: A large health service may conduct a general psychosocial risk assessment as well as separate risk assessments for:

- worker exposure to a range of psychosocial hazards in its high-volume call centre
- worker exposure to work-related violence and aggression in the emergency room
- work-related bullying of junior staff such as nurses or doctors; and
- nurses and allied health workers visiting patients' homes to conduct home assessments.

However, where psychosocial hazards and their risks are well recognised, and have well-known and accepted control measures within an industry, those control measures can be implemented without undertaking a further risk assessment.

Example: The use of security screens, remote locking mechanisms or duress alarms within service industries (e.g. a bank, or health service setting) to control the risk of exposure to work-related violence and aggression from clients.

When this occurs, these control measures **must** be reviewed and, as necessary, revised to confirm they are working as intended and continue to be effective (see Chapter 6— Review control measures).

Additional considerations when assessing the risk of work-related violence and aggression. The serious nature of work-related violence and aggression means that even if the likelihood of the behaviours occurring is low, the severity of harm that can result can be very high. For this reason, where the risk of work-related violence and aggression is inherent in the nature of the work, a separate risk assessment specific to work-related violence and aggression should be conducted. This may include consideration of the risk associated with individual clients who have a history of violence or aggression.

Examples: The risk of work-related violence and aggression may be inherent in work involving field-based police officers, corrections officers, healthcare workers working with violent patients, first responders, child safety officers, call centre workers, and public transport operators such as bus drivers.

Other psychosocial hazards should still be considered as part of a risk assessment for work-related violence and aggression, as a combination of psychosocial hazards can increase the risk of harm.

Example: Role overload, poor support, and remote work can combine to increase the risk of work-related violence and aggression.

4.2 How to assess psychosocial risks

Once you have identified all the hazards you should assess the risks. To assess the risk of harm, you need to identify the workers, and others, affected and consider:

- Duration how long is the worker exposed to the hazards or risks?
- **Frequency** how often is the worker exposed to the hazards or risks?
- Severity how severe are the hazards and the workers' exposures?
- How psychosocial hazards may interact or combine to increase risk.

Appendix C may assist you to capture this information.

Example 1: Infrequent exposure to low levels of work-related conflict may be unpleasant without causing a risk to health and safety, while frequent exposure to high levels of conflict can increase the likelihood of a prolonged stress response which may result in harm.

Example 2: A worker exposed to a short term but severe hazard (e.g. a violent incident) is more likely to experience harm if they are also exposed to chronic (long duration) psychosocial hazards (e.g. ongoing high demand and low support).

Example 3: Keeping cash on premises provides the potential for a robbery to occur (a hazard) and this may cause harm (e.g. being assaulted or post-traumatic stress disorder). However, while the work environment, including physical barriers, may mean the likelihood of death or serious injury from being assaulted is low, the likelihood of psychological injury may be higher.

Example 4: A worker exposed to aggressive customer behaviour is likely to be at higher risk if at that time they do not have other workers present to support them and are unable to control or alter the way they work to de-escalate the situation.

Consider psychosocial hazards collectively rather than in isolation. Workers and others may be exposed to more than one psychosocial hazard at any time and hazards can interact or combine. Assessing risks collectively may also assist you to identify more effective control measures.

Psychosocial risks increase when exposure to hazards is more severe (e.g. exposure to a traumatic incident), more frequent (e.g. regularly performing tasks without adequate support), or is longer in duration (e.g. high job demands over weeks or months).

The risks also increase when workers are exposed to a combination of the above mechanisms.

Psychosocial risks can cause both physical and psychological injuries. The severity of psychological injuries varies, but in comparison to physical injuries, on average, they require longer off work and are more costly.

When assessing risk, PCBUs must consult with workers, other duty holders, and HSRs where elected (see section <u>1.3 – Consultation</u>).

Depending on the circumstance, it may also be appropriate to consult:

- industry experts
- hazard experts (e.g. a human factors specialist or organisational psychologist where there
 are complex psychosocial risks present or security professionals where there is a risk of
 work-related violence and aggression); and/or
- Experienced WHS professionals who can assist with conducting a risk assessment and communicating the results to workers and their HSRs.

The following resources may assist with conducting a risk assessment:

People at Work risk assessment survey

People at Work is a free, validated psychosocial risk assessment survey available via a self-managed digital platform. The survey assesses several of the most common psychosocial hazards. People at Work enables workplaces to identify, assess and control risks to psychological health at work.

Suitable for: workplaces larger than 20 workers.

Resources required: person/s to manage the implementation of the process.

People at Work

Psychosocial risk assessment

A template for conducting a psychosocial risk assessment. The template also provides a risk management plan to help implement controls for the risks identified and an evaluation plan to track the effectiveness of controls.

Suitable for: all businesses.

Resources required: person/s to conduct the risk assessment and implement controls. Psychosocial risk assessment

Focus group guide

The focus group guide provides help on how to prepare and conduct a focus group, as well as how to analyse focus group data and report on findings.

Focus groups are a powerful tool to help you engage in consultation with workers.

Suitable for: all businesses.

Resources required: person/s to conduct the focus group(s) and review data and implement controls.

Participants allowed work time to attend the focus group session(s).

Focus group guide

The use of other reliable and valid tools or methods for conducting a risk assessment is acceptable, and it is up to the PCBU to decide which method to use, based on their circumstances and consultation with workers and HSRs.

It is recommended that a written record of risk assessments be kept.

Further information on how to conduct a risk assessment can be found in the Code of Practice: <u>How to manage work health and safety risks.</u>

5. Control the risks

WHS Regulation, section 35

Managing risks to health and safety

WHS Regulation, section 55D(1)

Psychosocial risks-control measures

Once you know which psychosocial hazards are present and you have assessed the risks they create, you are in a position to control them.



PCBUs **must eliminate** risks to health and safety, including psychological health, so far as is reasonably practicable.

If it is not reasonably practicable to eliminate risks, the risks **must be minimised** so far as is reasonably practicable.

To identify what can be done you should, in consultation with your workers, identify as many possible control measures as you can. This gives you the greatest scope to choose and apply the most effective control measures to eliminate or minimise risks. Consultation with workers will assist you to identify control measures you might not otherwise think of.

When deciding what control measures to use, a PCBU must have regard to all relevant matters and utilise the **hierarchy of controls** to help select the most appropriate control with the highest level of protection.

MATTERS TO CONSIDER WHEN CONTROLLING RISKS

How long (**duration**), how often (**frequency**) and how significantly (**severity**) workers are exposed to psychosocial hazards impacts the level of risks. Hazards **interacting** or **combining** with each other may also change the risks.

As PCBUs work through the risk management process they must consider things that may give rise to hazards, influence the level of risks workers are exposed to, or could be changed to help control those risks.

Table: Matters to consider when determining control measures for psychosocial risk

The duration, frequency, and severity of the exposure of workers and other persons to psychosocial hazards

The following factors will help determine suitable control measures:

- how long workers are exposed to psychosocial hazards (e.g. poor organisation change management over weeks or months)
- how often they are exposed (e.g. long shift patterns of remote and isolated work); and
- how severe the exposure may be (e.g. exposure to sexual harassment or a traumatic event).

Risk control measures that reduce these factors will be the most effective at eliminating or minimising the risk.

How the psychosocial hazards may interact or combine

Understanding how interacting hazards can increase or change psychosocial risk is important when determining appropriate control measures. This is because psychosocial risk can increase when workers are exposed to a combination of psychosocial hazards. Risk control measures may be implemented that reduce exposure to one or more interacting hazards in order to minimise the risk.

The design of work, including job demands and tasks

Control measures for psychosocial hazards should predominantly be considered at an organisational, work and system design level (e.g. organisational resilience) rather than at an individual level (e.g. individual resilience and stress management), although some circumstances may require responses at both levels.

Focusing on higher level control measures that address work design will ensure the risk of harm is addressed at the source, rather than inferior measures that only reduce the impact of harm after it has occurred.

Effective work design considers:

- the work: how work is performed, including the physical, mental and emotional demands of the tasks and activities, the task duration, frequency, and complexity, and the context and systems of work
- the physical working environment: the plant, equipment, materials and substances used, and the vehicles, buildings, structures that are workplaces; and
- the workers: physical, emotional and mental capacities and needs.

See the <u>Safe Work Australia Handbook: Principles of Good</u> <u>Work Design</u> for more information about how to achieve good work design and work processes.

| The design, layout, and environmental conditions of the workplace, including safe access and egress, welfare facilities and any premises occupied by the worker | The design and layout of a workplace can assist with controlling psychosocial risk. For example, worker accommodation that provides adequate privacy and security can minimise the risk of violence and aggression or harassment. | | | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|
| Systems of work used, including how work is managed, organised, and supported | Systems of work are organisational rules, policies, procedures and work practices used to organise, manage and carry out work. These systems can introduce psychosocial hazards but if carefully considered can also help control them. For example, a system of work that allows workers to seek assistance from supervisors or where tasks are allocated with regard for other work demands may assist with controlling risk. | | | | |
| Plant, substances and structures at the workplace | Well designed and maintained plant and structures can prevent exposure to psychosocial hazards such as high temperatures, loud noise, vibration or dust but can also be used to control other psychosocial hazards. For example, safe plant and structures that allow work to be performed more efficiently can reduce high work demands. | | | | |
| Workplace interactions or behaviours | Workplace interactions and behaviours are an important consideration in a psychosocial risk control plan. Supportive leadership, positive relationships and professional and respectful interactions can help to minimise a range of psychosocial hazards. | | | | |
| | A positive psychological safety climate can improve work health and safety by encouraging workers to seek and provide support, report hazards and participate in consultation. | | | | |
| Information, training, instruction and | Information, training, instruction and supervision may assist in controlling some psychosocial risk. For example, where low | | | | |

SELECT REASONABLY PRACTICABLE CONTROL MEASURES

For each of the controls you have identified, consider if it is reasonably practicable to implement under the hierarchy of controls in the circumstances. When determining what is reasonably practicable you must consider all relevant matters including:

role clarity is creating a risk, information and training on the

worker's role can assist in controlling this risk.

- the likelihood of the psychosocial hazard or the risk occurring
- the degree of harm that might result from the hazards or the risk
- the availability and suitability of ways to eliminate or minimise the risk
- what the person concerned knows, or ought reasonably to know about the hazards or risks, and about the ways of eliminating or minimising the risks; and
- after assessing the extent of the psychosocial risks and the available ways of eliminating
 or minimising risks, the cost associated with eliminating or minimising the risks, including
 whether the cost is grossly disproportionate to the risks.

The greater the risks, the more that is required to be done to eliminate or minimise it. This may mean using more than one, or a combination of control measures.

supervision provided to

workers

Where psychosocial hazards are only present for short periods, infrequently and are not severe, it may not be reasonable to implement expensive and time-consuming control measures. It may, however, be reasonable to apply less expensive controls.

Multiple control measures may be required. The aim must be to keep trying to lower the likelihood and degree of harm until further steps are not reasonably practicable in the circumstances.

Different psychosocial hazards can interact or combine to increase the risks. This means controlling the risks associated with one hazard can also minimise the risks from other psychosocial hazards.

When considering each control or combination of controls, a duty holder must take into account the likelihood of a particular control being effective.

COST OF CONTROL MEASURES

Cost is a matter to be taken into account and weighed up with other relevant matters to identify what is reasonably practicable, but this must only be done after assessing the extent of the risk and the ways of eliminating or minimising it.

Where the cost of implementing control measures is grossly disproportionate to the risks, it may be that implementing them is not reasonably practicable and therefore not required. This does not mean that you are excused from doing anything to minimise the risks. A less expensive way of minimising the risks must instead be used. If two control measures provide the same level of protection and are equally reliable, you can implement the less expensive option.

The question of what is reasonably practicable is determined objectively, not by reference to your particular business or undertaking's capacity to pay, or other individual circumstances. You cannot provide workers with a lower level of protection simply because you are in lesser financial position than another PCBU facing the same hazards or risks in similar circumstances.

Your goal to produce a product or provide a service at a particular price cannot override your duty to ensure, so far as is reasonably practicable, the health and safety of your workers and others.

5.1 Eliminating risks

Eliminating risks is the most effective control measure and PCBUs must always consider elimination before anything else. For psychosocial risks, eliminating means completely removing the psychosocial hazard and associated risks through good work design. You can consider work design or redesign as a way to eliminate risk, for example the introduction of rosters that provide advance notice of work hours schedules to eliminate the hazard of highly unpredictable work hours.

Examples of eliminating psychosocial hazards include:

- driverless buses/trams eliminating work related violence risks on public transport
- changing call centre operator processes from taking complaints over the phone to using a web form to eliminate conflict, abuse, and reduce role overload; and
- self-service to eliminate workers interacting with customers.

It may not be reasonably practicable to eliminate the risk, for example, if doing so means a product cannot be made or a service cannot be delivered.

Where a risk cannot be eliminated, PCBUs must minimise the risk so far as is reasonably practicable.

5.2 Minimising risks

WHS Regulation, section 36

Hierarchy of controls

WHS Regulation, section 55D(2)

Psychosocial risks-control measures

There are instances where the elimination of hazards is not possible, for example in instances where a job has an inherent hazard, such as shift or engagement with violent or abusive members of the public; or where eliminating the hazard will mean that a PCBU cannot deliver a product or service, or the cost of implementing the controls is grossly disproportionate to the risk.

If it is not reasonably practicable to eliminate the risk, you must minimise risks so far as is reasonably practicable using the hierarchy of controls. The hierarchy of controls ranks control measures from the highest level of protection and reliability to the lowest and requires duty holders to minimise risks by one or more of the following methods:

- Substitution: substituting the hazard for something safer.
- **Isolation:** Isolating the hazard from people, which can involve psychically separating someone from the hazard with a barrier. For example, placing barriers between workers and customers where there is a risk of assault.
- **Engineering controls:** A control measure that is generally physical in nature, including a mechanical device or process.

Every workplace is different. The best combination of control measures will be tailored to your organisation's size, type and work activities to manage risks during both everyday operations and emergencies. Example control measures are provided in <u>Appendix A</u> and <u>Appendix B</u>.

To identify what can be done you should, in consultation with your workers, identify as many possible control measures as you can. This gives you the greatest scope to choose and apply the most effective control measures to eliminate or minimise risks. Consultation with workers will assist you to identify control measures you might not otherwise think of.

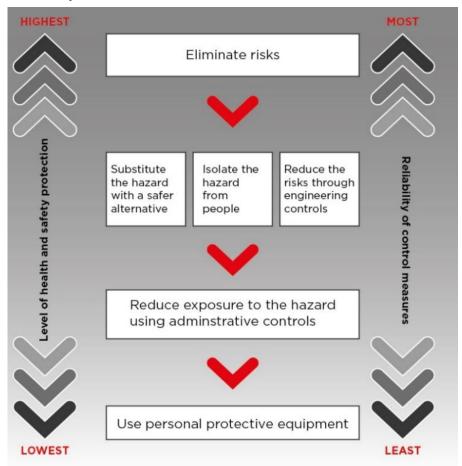
Controls can include good work design across the organisation or be targeted to certain areas where key risks are identified. Psychosocial risks must be minimised through relevant substitution, isolation and engineering controls.

If the risk remains, it must be minimised by implementing administrative controls, so far as is reasonably practicable.

Any further remaining risk must then be minimised with suitable personal protective equipment (PPE), so far as is reasonably practicable.

Administrative control measures and PPE do not control the hazard at the source. They rely on human behaviour and supervision and, used on their own, tend to be the least effective in minimising risks.

Figure 3: The Hierarchy of Controls



SUBSTITUTION, ISOLATION AND ENGINEERING CONTROLS

PCBUs must minimise psychosocial risks by either substituting or isolating the risk from the person, or implementing engineering controls so far as is reasonably practicable.

This can be done through good work design and systems of work.

- Substituting a hazard means substituting (wholly or partly) hazardous ways of working with less hazardous alternatives.
- Isolation of a hazard involves physically separating the source of harm from people exposed to the hazard.
- Engineering controls involve implementing physical controls to minimise the risk.

Substitution, isolation and engineering controls are higher order controls for managing psychosocial hazards and can be achieved through implementing good work design to manage hazards as early as possible.

When changing the design of work, you can consider the psychosocial hazards identified and look for opportunities to turn these into controls to mitigate risk. For example, where there is role overload such as excessive time pressure, role conflict, and poor practical support you could improve scheduling to minimise overload, clarify roles and responsibilities and provide additional practical support.

Safe systems of work can include, task allocation, rosters, set work hours, task rotation and breaks. While some of these may be considered substitution or isolation controls, others, where implementing policies, procedures or processes are more likely administrative controls (refer to section below on Administrative Controls).

You can minimise the risk of psychosocial hazards using the hierarchy of controls through the design of work. Examples of this include:

- providing workers with time and physical locations where they can retreat safely and recover from dealing with aggressive clients
- improving the work environment to reduce stressors (e.g. installing sound dampening technology or enclosing machinery to isolate workers from unpleasant or hazardous noise, increasing the lighting in darker areas, or placing barriers between workers and customers to minimise the risk of physical assault)
- allowing more time for difficult tasks to be completed safely, especially by inexperienced workers
- matching work allocation with appropriate resourcing including adequate numbers of workers, worker competencies, and levels of exposure to psychosocial hazards (e.g. considering the severity, complexity, and number of cases allocated to each worker when allocating child protection caseloads)
- providing sufficient cover for workers who are on leave
- designing work to minimise confusion by clearly defining workers' roles, reporting structures, tasks and performance standards
- designing work rosters to facilitate better work/life balance for workers required to work away from home
- providing workers with control over their work pace and allowing them to take breaks to manage their workload and fatigue instead of using machine pacing or automated work allocation
- increasing the level of practical support during peak workloads
- using a trauma-informed approach when responding to complaints of work-related violence and aggression, work-related bullying and sexual harassment and ensuring investigations are fair, independent and handled in a sensitive way
- using a trauma-informed approach to ensure the health and safety of 'others' in the workplace is not affected by the PCBU's undertaking, so far as is reasonably practicable (e.g. police using this approach when interviewing victims of sexual assault)
- using a trauma-informed approach to minimise the risk of work-related violence and aggression, so far as is reasonably practicable (e.g. youth workers supporting children in care or corrections officers when working in prisons); and
- changing venue of care from a home environment to a clinic environment for clients that have a history of aggressive behaviour.

See Appendix A for more controls.

See this table for an explanation of trauma-informed approaches.

ADMINISTRATIVE CONTROLS

Where the hazard and risk remains after implementing substitution, isolation and engineering controls, then administrative controls must be implemented to minimise the hazard and risk, so far as reasonably practicable.

You should consider administrative controls last and use them in combination with more effective controls. This is because they are less reliable due to their dependence on human behaviour.

Administrative controls should only be used:

- to supplement higher level control measures (as a back-up)
- as a short-term interim measure until a more effective way of controlling the risk can be used; or
- when there are no other practical control measures available (as a last resort).

Examples of combining administrative controls with higher order controls include:

- designing out work processes that may escalate client aggression, and considering what appropriate physical or other barriers (i.e. distance) should be used in conjunction with a client aggression policy and worker training and supervision; and
- where work involves inherent risk (i.e. front line responders), training should be provided to ensure workers have the skills to manage and respond to these situations, in conjunction with higher-order controls.

Administrative controls commonly include organisational policies and standard operating procedures that are designed to minimise exposure to a hazard, as well as the information, training and instruction needed to ensure workers can work safely.

Examples of administrative controls include:

- having clear expectations about acceptable behaviours at work, including policies for work-related bullying, sexual harassment and other forms of harassment
- policies and procedures to manage hazardous tasks
- ensuring workers have the right information, training, and supervision to perform their job safely
- consulting and training workers to prepare for the introduction of new equipment, software or production techniques
- providing supervisors with appropriate training in people and work management, and on the job support; and
- training workers and supervisors to recognise early warning signs of potential harm.

If your workplace has agreed policies, those policies relating to psychosocial hazards must be developed in consultation with workers and their HSRs (if elected), and all workers must be made aware of the procedure and what is expected of them.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

If risk remains after applying substitution, isolation, engineering and administrative control measures, PCBUs must minimise the remaining risk by ensuring the provision and use of suitable PPE, so far as is reasonably practicable. For psychosocial hazards, PPE can assist by controlling physical hazards that give rise to psychosocial risks.

Protecting workers with PPE is a last resort and should only be used where there are risks that cannot be minimised using higher order controls. If PPE is selected as last resort, it should be used in conjunction with administrative controls (e.g. the provision of information, instruction and training to workers and/or the implementation of safe work procedures).

Examples of using PPE as a control measure include providing:

- readily accessible gloves, gowns, and face shields for nurses and aged care workers to reduce stress from potential exposure to high-risk biological hazards; and
- high quality hearing protection or headphones to reduce stress from noise.

If PPE is to be used as a control measure, PCBUs who direct the carrying out of work must:

- provide PPE equipment to workers unless it has been provided by another PCBU
- ensure the equipment is:
 - selected to minimise risk to health and safety, including by ensuring the equipment is:
 - suitable for the nature of the work and any hazard associated with the work
 - of suitable size and fit; and
 - reasonably comfortable for the worker who is to use or wear it.
 - maintained, repaired and replaced so that it continues to minimise risk to the worker who uses it, including by ensuring that the equipment is clean and hygienic, and in good working order; and
 - used or worn by the worker, so far as is reasonably practicable.
- provide the worker with information, training and instruction in the proper use and wearing
 of PPE, and the storage and maintenance of PPE.

Workers must, so far as reasonably able, use or wear the PPE in accordance with any information, training or reasonable instruction and must not intentionally misuse or damage the equipment.

5.3 Implementing control measures

It is important to ensure a particular control measure will work before relying on it. PCBUs may need to test control measures, provide information, training or instruction to workers and supervise work to ensure control measures are effective.

TESTING CONTROL MEASURES

Testing control measures allows you to ensure they are suitable for your workplace, operate as intended and do not introduce new risks.

PCBUs should allow enough time for workers to adjust to changes (e.g. new work processes) and time for the control measures to work before assessing the effectiveness of control measures. At this stage, PCBUs should frequently check with workers on how they think the improvements are working and supervise workers to ensure controls are implemented effectively.

INFORMATION, TRAINING, INSTRUCTION AND SUPERVISION

WHS Act, section 19

Primary duty of care

WHS Regulation, section 39

Provision of information, training and instruction

As you are planning to implement control measures, they must consider what information, training, instruction or supervision is required to ensure the control measures are effective.

Training must be suitable and adequate, having regard to:

- · the nature of the work to be carried out
- the associated psychosocial hazards and risks; and
- the control measures to be implemented.

Training should require workers to demonstrate they are competent in performing the task. It is not sufficient to simply tell a worker about the procedure and ask them to acknowledge they understand and can perform it. Training may include formal training courses, in-house training or on the job training.

For example, if supervisors and managers have a role in implementing workplace policies on addressing harmful behaviours, PCBUs must provide them with any training necessary to ensure safety. This may include training which provides guidance on how to respond if they witness, experience or have a worker approach them about violence and aggression, bullying or sexual harassment at work or know who to seek guidance from if they have questions.

Information, training and instruction must be provided in a form all workers can understand, for example training may need to be provided in other languages and plain English. Information and instruction may also need to be provided to others who enter the workplace, such as customers or visitors.

The level of supervision required will depend on the risks and the experience of the workers involved. High levels of supervision are necessary where inexperienced workers are expected to follow new procedures or carry out difficult and critical tasks.

Information, training and instruction in relation to psychosocial hazards can include:

- how to implement a system of work relating to a psychosocial hazard
- expected behaviour and conduct at work including all relevant policies and procedures (e.g. for respectful workplace behaviours, conflict management, the prevention of work-related bullying, sexual harassment at work and work-related violence or aggression)
- what to do if a psychosocial hazard is identified, how to report it and how to seek help or support
- management training about implementing good work design and minimising the risk of harm from psychosocial hazards, supporting workers, identifying psychosocial hazards at work, and managing conflict; and
- management and supervisor training on how to respond to, manage and investigate complaints, reports or incidents involving psychosocial hazards including work-related bullying, work-related violence and aggression and sexual harassment.

It is good practice to keep a record of all training so there is documentation of who has been trained, how they performed and whether any further training is required, including refresher training.

MAINTENANCE

WHS Regulation, section 37

Maintenance of control measures

PCBUs **must** ensure that control measures are maintained so that they remain effective, including by ensuring they are fit for purpose, suitable for the nature and duration of the work; and set up and used correctly. PCBUs should decide what maintenance a control measure will require when implementing the control and establish a schedule for routine checks and maintenance. PCBUs may prepare a risk register identifying the hazards, what action needs to be taken, who will be responsible for taking the action and by when (See Appendix C).

WORKPLACE POLICIES

Workplace policies can provide important information and help ensure everyone involved understands the business or undertaking's processes for managing psychosocial risks. Policies alone should not be relied on to control psychosocial risks, but they can detail responsibilities and help set clear expectations, particularly about behaviours at the workplace and during work-related activities.

PCBUs may have separate policies or one policy which covers several work health and safety issues.

Where you have policies relating to psychosocial risks these must be developed in consultation with workers and any HSRs. All workers must be made aware of the policies and what is expected of them.

Controlling risks arising from management action

Management action, such as managing unsatisfactory performance or poor behaviour is a necessary part of conducting a business or undertaking. Management action may also be necessary to prevent or control psychosocial hazards, for example:

- increased demands on other workers due to unsatisfactory performance; or
- behaving in a way that may harm others.

PCBUs may be concerned about balancing the need to undertake performance action with the duty to eliminate or minimise psychosocial risks that may arise from the process, so far as is reasonably practicable. This can be done by:

- addressing psychosocial hazards contributing to unsatisfactory performance or poor behaviour; and
- designing the management process in a way that eliminates or minimises psychosocial risks.

<u>Addressing psychosocial hazards contributing to unsatisfactory performance or poor behaviour</u>

Unsatisfactory performance or poor behaviour may be the result of multiple factors, including psychosocial hazards affecting the worker. Confirming whether all psychosocial hazards have been eliminated or minimised so far as is reasonably practicable will help you to ensure you are meeting your duties. A range of psychosocial hazards can contribute to poor performance and harmful behaviour, such as:

- lack of support, training or instruction to perform the role
- lack of clarity on the role and requirements
- poor interpersonal relationships
- little say on how work is done; or
- excessive workloads, deadlines or complexity of work.

Eliminating or minimising psychosocial risks in the management process

PCBUs must ensure they have eliminated or minimised any risks in their management process, so far as is reasonably practicable. For example, control risks associated with:

- poor organisational justice by ensuring you apply policies transparently and fairly; and
- poor interpersonal relationships by conducting the process in a respectful and constructive way.

6. Review control measures

The last step of the risk management process is to review the effectiveness of the implemented control measures to ensure they are working as planned. If a control measure is not working effectively, it must be reviewed and modified or replaced.

WHS Regulation, section 38

Review of control measures

Reviewing control measures should be done regularly and is required:

- when the control measure is not eliminating or minimising the risks so far as is reasonably practicable
- before a change at the workplace that is likely to give rise to a new or different health and safety risk that the control measure may not effectively control
- if a new hazard or risk is identified
- if the results of consultation indicate a review is necessary; or
- if an HSR requests a review because they reasonably believe one of the above has occurred and it has not been adequately reviewed already.



Reports, complaints (including informal complaints) or grievances from workers may identify new psychosocial hazards or risks that are not adequately controlled. This should trigger a review of whether existing control measures are effective, if response procedures worked the way they were supposed to and whether new risks have been identified that also need to be managed.

Common review methods include inspecting the workplace, consultation, and analysing records and data. PCBUs can use the same methods as in the initial hazard identification step to check control measures. PCBUs must also consult workers and their HSRs.

The person reviewing control measures should have the authority and resources to conduct the review thoroughly and be empowered to recommend changes where necessary. Questions to consider may include:

- Are control measures working effectively, without creating new risks?
- Have workers reported feeling stressed or are they showing signs of harm?
- Have all psychosocial hazards been identified?
- Have risks changed or are they different to what you previously assessed?
- Are workers actively involved in the risk management process?
- Are workers openly raising health and safety concerns and reporting problems promptly?
- Has instruction and training been provided to all relevant workers?
- Are there any upcoming changes that are likely to result in a worker being exposed to psychosocial hazards?
- Are new control measures available that might better control the risks?

- · Have risks been eliminated or minimised as far as is reasonably practicable?
- If the effectiveness of the control measures is in doubt, go back through the risk management steps, review your information and make further decisions about control measures.

7. Recording the risk management process and outcomes

PCBUs should record the risk management process and the outcomes, including consultation with workers. This allows you to demonstrate you have met your WHS duties and will assist you when you need to monitor or review the hazards you have identified and controls you have put in place.

Your records may include the outcomes of consultation, the hazards you identified, how you assessed the risks, the control measures implemented, and the training provided.

You should select a method of recording the risk management process and outcomes to suit your circumstances. For example, you can use a risk register such as the one in the Code of Practice: <u>How to manage work health and safety risks</u> or in <u>Appendix C</u>.

It is also useful to have a record of the processes used to investigate and resolve issues. You could choose to include only high-level information in the general risk register where you are concerned about the need to maintain confidentiality.

A WHS inspector may ask to see a copy of records relating to the risk management processes if they visit your workplace. If you do not have a written record, you will need to demonstrate by other means how you have met your duties.

8. Conducting WHS investigations

Any WHS investigations into reports of incidents involving psychosocial risks should primarily aim to identify or characterize hazards or new or improved control measures.

Investigations must maintain appropriate privacy and confidentiality of all workers involved to the extent permitted by law. For example, do not discuss reports in public areas or with anyone not involved in the investigation. Ensuring confidentiality should not prevent the parties involved from seeking support.

NATURE OF INVESTIGATION

The nature of your investigation should be proportional to the risks and suit the circumstances. When deciding the nature of an investigation consider the:

- level of risks involved
- · complexity of the situation; and
- number of workers involved or affected.

A formal investigation may not always be the most effective option. For example, the best response to a single low-level incident may be immediate informal discussions with the workers involved and changes to the relevant control measures. The earlier problems can be identified and addressed, the less likely a formal and complex investigation will be required.

Small businesses may require assistance if a matter is complex or high risk. PCBUs can seek advice from the WHS regulator, their industry body or a WHS expert.

SELECTING AN INVESTIGATOR

It is important to find an investigator who has the confidence of all parties involved where possible. They should be impartial and have the skills and knowledge to identify psychosocial hazards, assess the risks and recommend appropriate controls.

An external investigator may be required if an impartial internal investigator is not available, for example where a matter involves a senior manager.

BALANCING A FAIR AND TRANSPARENT PROCESS

The investigation should be fair, transparent and timely to ensure due process for both those who raised the issue and any workers who have had allegations made about them.

Throughout the investigation affected workers should be:

- informed of their rights and obligations during the process
- provided with the opportunity to respond to any allegations made against them
- provided with a copy of relevant policies and procedures
- kept informed about possible outcomes, timeframes, rights of appeal and reviews; and
- provided with adequate and fair support.

CONCURRENT INVESTIGATIONS

Harmful behaviours, such as bullying and harassment can be inappropriate responses from workers exposed to other hazards, for example high job demands and poor support. Where these behaviours breach employment codes of conduct or professional standards you may require a separate investigation into these breaches as a disciplinary matter, as well as a systematic WHS investigation looking at any hazards present and ensuring they are controlled. Where breaches of a code of conduct or professional standard are not proven there may still be an underlying WHS risk which needs to be controlled.

Appendix A – Job characteristics, design and management

This appendix provides examples of control measures for psychosocial hazards related to job characteristics, design and management, and the working environment and equipment including:

- high or low job demands
- low job control
- poor support
- traumatic events or material
- remote or isolated work
- lack of role clarity
- · poor organisational change management
- inadequate recognition
- · poor organisational justice; and
- poor environmental conditions.

However, it is not an exhaustive list and you should use the process outlined in this Code to ensure you identify all hazards in your workplace and assess and control the associated risks.

A single or irregular exposure to these hazards may not create psychosocial risks, or the risks may be very low. However, if workers' exposure to a hazard (or a combination of these hazards) is frequent, prolonged or severe it can cause psychological and physical harm.

The controls provided are examples. You must consider what is reasonably practicable to eliminate or minimise the risks in your workplace.

Job demands

Sustained or intense high levels of physical, mental or emotional effort which are unreasonable or chronically exceed workers' skills, or sustained low levels of physical, mental or emotional effort. A job can include periods of high and low job demands. A job can also involve a combination of low or high mental, emotional and physical demands.

Note: Some of these examples of hazards may not create psychosocial risks on their own but may do so if combined with other hazards. Some hazards may only create risks on their own when severe. Consider all hazards present and the circumstances to determine what is reasonably practicable to manage the risks.

long, irregular or unpredictable work-hours (e.g. doing shift work or being on High physical demands insufficient breaks (e.g. breaks are infrequent, too short, strictly scheduled or regularly interrupted) not being able to recover between periods of work (e.g. being expected to work afterhours, be on call, or return to work with insufficient rest and sleep) not having opportunities to use leave entitlements high workloads (e.g. having too much to do) physically demanding, challenging or tiring work (e.g. undertaking hazardous manual tasks or strenuous physical tasks); and time pressures or fast paced work (e.g. unreasonable deadlines or computer/machine paced work). complex tasks frequently or severely exceeding a worker's capacity or High mental or competency (e.g. workers lack the training, resources, skills, authority or cognitive experience to reasonably or successfully do tasks) demands sustained levels of concentration or vigilance particularly when accuracy is required or workers are looking for infrequent events (e.g. long-distance driving or security monitoring) work where errors may have high reputational, legal, career, safety or financial risks (e.g. air traffic control, medical care or decisions affecting a large number of people) absence of systems to prevent individual errors (e.g. relying on workers to memorise information or perform manual calculations without checks); and repeatedly or rapidly switching tasks so it is difficult to concentrate and complete tasks (e.g. being frequently interrupted or having to do numerous things at once). responding to distressing or emotional situations (e.g. dealing with **High emotional** confrontation) demands managing other people's emotions (e.g. de-escalating an aggressive situation, undertaking disciplinary processes or assisting people who are distressed) providing support or empathy (e.g. conveying bad news, providing advocacy or counselling); and suppressing emotions or displaying false emotions (e.g. nursing staff hiding distress for patients or retail workers pretending friendliness with difficult customers). having too little to do (e.g. running out of work) or long idle periods where Low job workers cannot perform other tasks (e.g. where a worker must monitor a demands process and cannot perform other tasks until it is complete) highly monotonous or repetitive tasks which require low levels of thought processing and little variety (e.g. packing products or monitoring production lines) work that is too easy (e.g. significantly below a worker's skills or abilities); idle periods when high workloads are present (e.g. having urgent work but

available).

being unable to proceed until equipment, resources or support become

CONTROLLING JOB DEMANDS

Note: These are examples only. You must identify and implement control measures that eliminate or minimise the risks in your workplace, so far as is reasonably practicable.

| Job/work design | Schedule tasks to avoid intense or sustained low or high job demands (e.g. schedule non-urgent work for quieter periods) Manage supply chains to avoid large fluctuations in demand (e.g. delays in supplies causing backlogs of orders); and Plan shifts to allow adequate rest and recovery, particularly between periods of high demand. |
|-------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Physical work environment | Design the workplace to eliminate demanding tasks or jobs (e.g. locate the storeroom next to the loading dock so deliveries do not require double handling) Provide quiet spaces for workers doing mentally demanding work Implement systems to reduce human error (e.g. use IT systems to capture important information and generate reminders); and Provide appropriate break areas (e.g. air-conditioned or shady areas for physically demanding work or staff-only areas for workers dealing with difficult customers). |
| Modifying job demands | Plan your workforce so you have an adequate number of appropriately skilled staff to do the work and so that tasks use your workers' skills Roster enough workers to ensure they can take required breaks over long or busy shifts Roster enough workers to ensure they can take required breaks over long or busy shifts Rotate workers through demanding or repetitive tasks Reschedule non-urgent tasks if demand is unexpectedly high or low Provide additional support during periods of high demand (e.g. provide more workers, better equipment or outsource tasks) Schedule enough time for difficult tasks to be completed safely. Inexperienced workers may require additional time, supervision or support; and Outsource tasks to external companies with the capacity to deliver services safely (e.g. outsource tasks to companies that have appropriately skilled workers or specialised equipment). |
| Safe work systems and procedures | Empower workers in situations where they face high emotional demands (e.g. allow discretion in providing refunds where appropriate to avoid customer aggression or distress) Have regular conversations about work expectations, workloads, deadlines and instructions to ensure job demands are understood and can be managed Regularly review and update work policies and procedures to avoid unnecessary work (e.g. ensure reporting lines are suitable for current workloads); and Have systems for escalating problems and getting support from managers. |
| The worker | Set achievable performance targets, with consideration for the worker's experience and skills Provide training if required to ensure workers have the skills to meet work demands; and If emotional demands are an unavoidable part of a worker's role, ensure these are captured in the position description and applicants are informed at the pre-selection stage (e.g. at interview) of the demanding nature of the role. |
| For informat | stage (e.g. at interview) of the demanding nature of the role. |

For information on safe physical work environments see the <u>Code of Practice</u>: <u>Managing the</u> <u>work environment and facilities</u>. For information on designing structures which will, or could reasonably be, used as a workplace see the <u>Code of Practice</u>: <u>Safe design of structure</u>.

Low job control

Having little control or say over the work or aspects of the work including how or when the job is done.

Note: Some of these examples of hazards may not create psychosocial risks on their own but may do so if combined with other hazards. Some hazards may only create risks on their own when severe. Consider all hazards present and the circumstances to determine what is reasonably practicable to manage the risks.

Low job control may include:

- requiring permission or sign-off before progressing routine or low risk tasks (e.g. before ordering standard monthly supplies or sending routine internal emails)
- workers' level of autonomy not matching their abilities (e.g. inexperienced and highly skilled workers are given the same level of autonomy)
- prescriptive processes and not allowing workers to apply their skills or judgment (e.g. work
 is tightly scripted and workers cannot adapt to the specific situation)
- lack of consultation about changes impacting their work (e.g. changing processes for interacting with clients)
- limited scope for workers to adapt the way they work to changing situations or adopt efficiencies in their work (e.g. not allowing workers to adapt processes which do not suit the situation)
- workers have little influence on how they do their work, when they change tasks or take breaks (e.g. work is machine or computer paced)
- workers are unable to avoid dealing with aggression or abuse (e.g. police or healthcare services); and
- workers do not have control over their physical environment (e.g. working in uncomfortable temperatures).

CONTROLLING LOW JOB CONTROL

Note: These are examples only. You must identify and implement control measures that eliminate or minimise the risks in your workplace, so far as is reasonably practicable.

| Job/work design | Match workers' level of autonomy to their skills and experience Implement consultation arrangements to regularly discuss the work, how it is done and any changes impacting workers Develop governance arrangements and approval processes that balance risks and efficiency to streamline lower risk tasks; and Design processes and systems to deal with new situations and provide autonomy for workers to apply their judgement when processes are not fit for purpose. |
|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Physical work environment | Design processes and systems so workers control their workflow (e.g. use electronic systems to filter client queues and give workers control over when the next client is called) If work is machine or computer paced, design processes so workers can alter the pace of work, change tasks, or pause the workflow to take breaks; Provide workers with reasonable control over their physical environment (e.g. workers can adjust their workstation); and Ensure equipment is maintained and appropriate to the task. |
| Improving job control | Plan any regular additional work hours or changes to work in advance with workers (e.g. if additional hours are usually required during peak season, plan this in advance with workers) Involve workers in organisational decision-making processes and encourage suggestions for continuously improving work practices Plan deadlines, performance targets, work allocations and work plans in consultation with workers Hold regular team meetings and discuss any work challenges with workers and discuss how problems could be solved; and Monitor staff in a way that is not excessive or punitive. |
| Safe work systems and procedures | Create an environment where workers feel empowered to raise safety concerns about work requirements Encourage workers to suggest changes or adopt efficiencies in their work; and Provide leadership and supervision that supports workers to take reasonable control over their work. |
| The worker | Develop a performance management system that ensures workers have input into the way they do their work rather than focusing only on output; and Hire workers with the right mix of skills and experience for the position including the level of autonomy the job will have. |

Poor support

Inadequate support, including insufficient support from supervisors or other workers. Not having the resources, they need to do the job or support work performance.

Note: Some of these examples of hazards may not create psychosocial risks on their own but may do so if combined with other hazards. Some hazards may only create risks on their own when severe. Consider all hazards present and the circumstances to determine what is reasonably practicable to manage the risks.

Poor support may include:

- insufficient, unclear or contradictory information (e.g. necessary information is not passed on or is communicated poorly)
- not having the things to do their job properly or on time (e.g. not having the necessary tools, systems, equipment or resources)
- frequently needing to compete for the things needed to do the job (e.g. where multiple workers need to use equipment at the same time)
- poorly maintained or inadequate tools, systems and equipment (e.g. tools are broken or IT systems do not work as intended)
- inadequate training for the task (e.g. new workers are asked to do complex tasks or workers are expected to use new tools without training)
- jobs where supervisors are unavailable to make decisions or provide support (e.g. they work from a different location or are frequently in meetings)
- inadequate guidance from supervisors or assistance from other workers (e.g. other workers are not available to help safely complete tasks)
- workers cannot ask for help when needed (e.g. workers are not able to pause work, leave their workstations or are working remotely without means to contact supervisors)
- workplace cultures that discourage supervisors or co-workers supporting each other (e.g. highly competitive, insecure, critical, uncooperative or uncollaborative workplaces)
- working environments that discourage discussion (e.g. lack of suitable spaces to discuss sensitive issues or where workers are physically separated)
- limited emotional support or unempathetic leadership (e.g. supervisors do not notice when workers are struggling, do not take issues seriously or provide a safe space to raise issues); and
- infrequent or poor performance feedback and discussions (e.g. feedback is unclear, unhelpful or not provided).

CONTROLLING POOR SUPPORT

Note: These are examples only. You must identify and implement control measures that eliminate or minimise the risks in your workplace, so far as is reasonably practicable.

| Ur miniminise me naka in j | your workplace, so far as is reasonably practicable. |
|----------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Job/work design | Implement good information sharing systems so workers have quick access to the information they need to do their jobs (e.g. ensure databases are kept up to date and are user friendly) Design work so supervisors have manageable workloads, sufficient resources and their span of control allows effective supervision (e.g. supervisors have time to answer questions or assist with challenging tasks) Establish systems to ensure regular, fair, goal-focused and constructive feedback discussions occur between workers and supervisors to discuss work tasks, and any support or development needs (e.g. implement end of shift debriefs or require supervisors to do quarterly check ins) Provide clear management structures and reporting lines (e.g. provide organisational charts or ensure workers understand who to go to for help); and Train workers on how to do their jobs and use relevant tools, equipment, systems. |
| Physical work environment | Provide workers with the things they need to do their jobs properly and safely (e.g. the right tools, equipment, systems and resources) and ensure workers have sufficient access to them (e.g. they are conveniently located and workers do not need to compete for access) Provide workers with access to supervisors (e.g. locate workers close to their supervisor or if working remotely provide tools like videoconferencing); and Design the work environment to facilitate cooperation and ensure people can ask for help (e.g. workers can easily have discussions with others and there are suitable meeting spaces). |
| Increasing support | Hold regular team meetings, and discuss any challenges, issues and support needs (eg. ask workers about any new challenges or training they may need) Build a workplace culture that values collaboration and cooperation instead of competition (e.g. establish team rather than individual goals or praise cooperation) Maintain tools, systems and equipment, and review whether they are suitable for the work (e.g. ensure equipment works and consider whether other equipment might work better or more efficiently) Schedule meetings to ensure supervisors have availability during workers' usual hours to meet with them so workers can raise issues or ask questions Increase the level of support during peak periods or challenging tasks (e.g. roster more workers on during peak season or check in more often for challenging tasks) Backfill roles or redistribute work when workers are out of the office or on leave Design rosters so supervisors are available to help during difficult or busy times; and Set clear work goals and clearly explain tasks. |
| Safe work systems | Set clear work goals and clearly explain tasks. Establish open communication (e.g. have an open-door policy) and |

| and procedures | encourage workers to share concerns early (e.g. by taking their concerns seriously and ensure they have safe spaces to raise them) Embedding training and information in workplace policies and procedures; Encourage and reward workers supporting each other; and Encourage the development of positive working relationships (eg. invest in team planning and building activities and encourage team discussions). |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The worker | Hire supervisors with the skills, experience and training to perform their role and support their team; and Provide development programs to improve supervisors' skills. Establish inductions, training and mentoring (e.g. buddy programs) for new workers. |

Lack of role clarity

Unclear, inconsistent or frequently changing roles, responsibilities or expectations. Lack of important job-related information.

Note: Some of these examples of hazards may not create psychosocial risks on their own but may do so if combined with other hazards. Some hazards may only create risks on their own when severe. Consider all hazards present and the circumstances to determine what is reasonably practicable to manage the risks.

Lack of role clarity may include:

- unclear, inconsistent, or frequently changing jobs or role responsibilities
- overlap in responsibilities between workers (e.g. workers are given the same task and are not clear who is responsible for what)
- conflicting, uncertain, or frequently changing expectations and work standards (e.g. workers are given conflicting deadlines or instructions)
- conflicting, unclear or changing reporting lines
- missing or incomplete task information; and
- a lack of clarity about work priorities (e.g. which tasks or stakeholder relationships are most important).

CONTROLLING LACK OF ROLE CLARITY

Note: These are examples only. You must identify and implement control measures that eliminate or minimise the risks in your workplace, so far as is reasonably practicable

| Job/work design | Provide position descriptions that clearly outline all key tasks, responsibilities and role expectations Design management structures with clear reporting lines Provide workers with a single immediate supervisor Detail reporting lines in an organisational chart; and Design performance feedback mechanisms where employees receive regular feedback and have an opportunity to raise concerns about role clarity. |
|----------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Physical work environment | Provide a workplace which is compatible with workers responsibilities (e.g. seat workers with their teams); and Provide systems, tools and equipment which is compatible with workers' responsibilities (e.g. IT systems with profiles set up for different users and access to programs they need for their role). |
| Providing role clarity | Provide clear work instructions and expectations, explain why roles, responsibilities and tasks have been allocated, and ensure workers understand Ensure workers assigned to the same task understand who is doing what Change tasks or processes that frequently create conflict, confusion, or result in frequent mistakes (e.g. provide clearer explanations or redesign the tasks) Update job descriptions and any role expectations following changes Implement regular check-ins and encourage open discussion among team members to ensure they are clear about who is doing what Provide all workers with an induction and on-going training to ensure they understand their role Provide clear guidelines for what to do when expectations do not align (e.g. between workers, workers and supervisors, or workers and clients); and Implement systems to help workers identify issues or conflicts and resolve them. |
| Safe work systems and procedures | Talk to workers to ensure they understand their role, your expectations, who they report to and the organisation's work more broadly Encourage feedback on changes that affect workers' job tasks Embed a performance feedback in workplace procedures for employees to receive regular feedback and provides them an opportunity to raise concerns about role clarity; and Check with employees to ensure they understand any additional or different responsibilities or duties following an organisational change or restructure. |
| The worker | Encourage workers to talk to their supervisor or manager early if they are unclear about the scope or responsibilities of their role; and Provide a realistic job summary and overview during recruitment and selection processes so applicants are aware of the role, expectations and responsibilities. |

Poor organisational change management

Organisational change management that is poorly planned, communicated, supported or managed.

Note: Some of these examples of hazards may not create psychosocial risks on their own but may do so if combined with other hazards. Some hazards may only create risks on their own when severe. Consider all hazards present and the circumstances to determine what is reasonably practicable to manage the risks.

Poor organisational change management may include:

- not consulting workers on changes in the workplace (e.g. not talking to workers or genuinely considering their views)
- poor consideration of WHS risks or performance impacts of a change (e.g. not considering health and safety risks when downsizing, relocating or introducing new technology or not allowing for drops in productivity while workers learn new processes)
- poorly planned changes (e.g. changes are disorganised, do not have a clear goal or do not account for workers' needs; inadequate communication with stakeholders causing disruption)
- poor communication about planned changes (e.g. allowing rumours to spread without providing timely, authoritative information)
- insufficient information is provided regarding changes (e.g. information is unclear or does not provide enough guidance for workers to understand and engage with the change)
- inadequate support for workers through the change process (e.g. not allowing time for workers to learn new tasks); or
- providing insufficient training to support changes (e.g. how to perform a new role or use a new process).

CONTROLLING POOR ORGANISATIONAL CHANGE MANAGEMENT

Note: These are examples only. You must identify and implement control measures that eliminate or minimise the risks in your workplace, so far as is reasonably practicable.

| Job/work design | You must consult workers who are, or are likely to be, affected by a WHS matter. You must agree consultation arrangements with your workers and should design them to suit your workplace. You must use agreed consultation arrangements when planning changes that raise WHS concerns Modify work plans to allow for a period of change (e.g. adjusting performance targets while workers learn new roles); and Plan any changes to duties, tasks, objectives and reporting arrangements to ensure they are reasonable and fair (e.g. ensure workers will not have too much to do). |
|--------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Physical work environment | Provide practical support for changes in duties, tasks or objectives (e.g. ensure workers have access to the tools and resources they need to perform a new task); and Provide mechanisms to guide workers and managers through the change process (e.g. provide information or feedback sessions to address any concerns). |
| Managing and communicating organisational change | Provide authoritative information about upcoming changes and options being considered as soon as possible, keep workers up to date, and ensure workers understand the changes (e.g. provide updates at team meetings or on notice boards) Inform customers and suppliers about changes and any impacts this will have Provide workers with the reasons for changes; and Provide emotional support to help workers deal with challenges or frustrations resulting from change and uncertainty. |
| Safe work systems and procedures | Encourage workers to engage with the development of new position descriptions and work processes Encourage workers to engage with consultation and raise any issues, concerns or suggestions; and Respect individual differences and recognise workers will respond to change in a range of ways and will have different needs in consultation and engagement. |
| The worker | You must provide workers any information, training, instruction and supervision necessary to safely complete their work (e.g. train them on safely using new equipment); and Ensure the person communicating changes has the skills and authority to do so, and supervisors have the skills to support workers through periods of change. |

Inadequate recognition and reward

Jobs where there is an imbalance between workers' effort and recognition or rewards, both formal and informal.

Note: Some of these examples of hazards may not create psychosocial risks on their own but may do so if combined with other hazards. Some hazards may only create risks on their own when severe. Consider all hazards present and the circumstances to determine what is reasonably practicable to manage the risks.

Inadequate recognition and reward may include:

- receiving unfair negative feedback (e.g. criticism on things workers cannot control or on things for which they have received insufficient training and support)
- receiving insufficient feedback or recognition (e.g. workers do not receive feedback on their work or are not given information to help them improve; workers are not acknowledged or rewarded for high effort or supporting colleagues)
- unfair, biased, opaque, or inequitable distribution of recognition and rewards (e.g. workers being rewarded for the efforts of others)
- limited opportunities for development (e.g. a lack of job training or development); or
- not recognising workers' skills (e.g. closely supervising or directing an experienced staff member on simple tasks).

CONTROLLING INADEQUATE RECOGNITION AND REWARD

Note: These are examples only. You must identify and implement control measures that eliminate or minimise the risks in your workplace, so far as is reasonably practicable.

| Job/work design | Use fair, transparent and meaningful ways of providing recognition and rewards to reflect workers efforts (e.g. avoid only recognising the workers doing high profile work; recognise teamwork and corporate contributions) |
|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | Design fair and transparent performance management mechanisms (e.g. ensure performance measures relate to aspects of work within a worker's control and consult workers on performance expectations); and |
| | Train supervisors on how to have difficult conversations and manage underperformance in a way that prioritises improvement over blame. |
| Providing appropriate | Provide recognition or feedback promptly and ensure it is specific, practical, fair and clearly relates to workers' performance; and |
| recognition and reward | Consult workers when designing reward and recognition systems. |
| Safe work systems and procedures | Develop leaders' abilities to provide constructive feedback and recognise good performance |
| | Ensure performance management systems focus on aspects of work that are within the worker's control |
| | Ensure you attribute work correctly and ensure the right workers receive recognition for achievements; and |
| | Embed supervisor training about having difficult conversations and managing underperformance in a way that prioritises improvement over blame in workplace policies and procedures. |
| The worker | Implement systems to support performance (e.g. training and mentoring) and provide opportunities for development (e.g. allow workers to take ownership of particular tasks); and |
| | Recruit or train supervisors with the skills to provide constructive feedback and recognise the contributions of workers. |

Poor organisational justice

Poor organisational justice involves a lack of procedural justice (fair processes to reach decisions), informational fairness (keeping people informed), or interpersonal fairness (treating people with dignity and respect).

Note: Some of these examples of hazards may not create psychosocial risks on their own but may do so if combined with other hazards. Some hazards may only create risks on their own when severe. Consider all hazards present and the circumstances to determine what is reasonably practicable to manage the risks.

Poor organisational justice may include:

- failing to treat workers' information sensitively or maintain their privacy (e.g. having performance discussions in front of others or using information for a purpose it was not disclosed for)
- policies or procedures that are unfair, biased or applied inconsistently (e.g. promotion based on favouritism, or applying disciplinary policies inconsistently or discriminatorily)
- penalising workers for things outside their control (e.g. for not producing a sufficient number of products when they did not have access to the required materials)
- failing to recognise or accommodate the reasonable needs of workers (e.g. failing to provide an accessible workplace)
- discriminating against particular groups or not applying policies fairly to some groups
- failing to appropriately address (actual or alleged) underperformance, inappropriate or harmful behaviour, or misconduct (e.g. not investigating allegations of sexual harassment or not providing procedural justice for workers accused of bullying)
- allocating work, shifts and opportunities in a discriminatory or unfair way (e.g. giving 'good' shifts based on friendships with supervisor); or
- no or inadequate processes for making decisions affecting workers (e.g. policies and processes do not set out the key considerations for disciplinary decisions).

CONTROLLING POOR ORGANISATIONAL JUSTICE

Note: These are examples only. You must identify and implement control measures that eliminate or minimise the risks in your workplace, so far as is reasonably practicable.

| Job/work design | Design unbiased and transparent workplace processes, policies and procedures in consultation with workers (e.g. decision making, recruitment, promotion, performance management, task allocation, WHS or workplace entitlement policies, conflict of interest declaration processes and additional/alternative avenues for reporting such as anonymous escalation) Consult workers when setting work standards or performance expectations. Ensure they are achievable and workers will not be penalised for things outside their control; and Provide mechanisms for workers to report issues, raise concerns or appeal workplace decisions. |
|----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Physical work environment | Design a workplace environment where private conversations can be held and ensure confidential information is kept secure; and Ensure the workplace accommodates reasonable needs of workers (e.g. provide accessible ramps, doors or IT equipment). |
| Safe work systems and procedures | Ensure workplace policies and procedures support workers to report issues, raise concerns or appeal workplace decisions in a timely and accurate manner Regularly review policies, processes, procedures, performance expectations and decisions to ensure they are appropriate, fair and reflect the needs of the workplace Communicate processes and information to workers in a timely and appropriate way (e.g. notify unsuccessful applicants privately before you publicly announce promotion decisions); and Provide systems to protect workers who raise safety concerns from discrimination (Sections 104-109 of the WHS Act prohibit discriminatory, coercive or misleading conduct). |
| The worker | Encourage workers to use available processes to raise concerns, issues or complaints early, and use appeal processes when necessary Ensure workers understand expectations and performance targets; and Hire and promote workers based on merit using transparent selection methods. |

Traumatic events or material

Witnessing, investigating or being exposed to traumatic events or material. A person is more likely to experience an event as traumatic when it is unexpected, is perceived as uncontrollable or is the result of intentional cruelty. This includes vicarious exposure and cumulative trauma.

Traumatic events involving work-related violence are covered in Appendix B.

Note: Some of these examples of hazards may not create psychosocial risks on their own but may do so if combined with other hazards. Some hazards may only create risks on their own when severe. Consider all hazards present and the circumstances to determine what is reasonably practicable to manage the risks.

Traumatic events or material may include:

- witnessing or investigating a fatality, serious injury, abuse, neglect or serious incident (e.g. working in child protection)
- exposure to seriously injured or deceased persons (e.g. working in an emergency department or as a forensic scientist)
- experiencing fear or extreme risks (e.g. being in a motor vehicle accident, workplace incident or near miss)
- exposure to natural disasters (e.g. emergency services workers responding to floods or bushfires)
- witnessing or investigating terrorism or war (e.g. police officers responding to terrorist attacks or journalists reporting on wars)
- supporting victims of painful and traumatic events (e.g. providing counselling services)
- listening to or reading descriptions of painful and traumatic events experienced by others (e.g. lawyers reviewing evidence or advocates helping with victim testimonies)
- finding evidence of crimes or traumatic events (e.g. customs workers or online moderators); and
- exposure to events that bring up traumatic memories.

CONTROLLING EXPOSURE TO TRAUMATIC EVENTS OR MATERIAL

Note: These are examples only. You must identify and implement control measures that eliminate or minimise the risks in your workplace, so far as is reasonably practicable.

| Job/work design | Design work to minimise the number of workers exposed to traumatic events (e.g. design roles so tasks that can be carried out away from an accident or disaster scene are performed from another location) |
|-----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | Coordinate and schedule tasks at traumatic scenes so workers are not exposed to unnecessary trauma (e.g. arrange for less urgent tasks to be performed after a body has been removed); and |
| | Train supervisors on responding to trauma and where they can get assistance. |
| Physical work environment | Eliminate physical risks to health and safety in the workplace to prevent trauma from a workplace incident or near miss |
| | Remove or secure potentially lethal means of self-harm (e.g. medications or hazardous chemicals) from the workplace or secure them (e.g. require two workers to enter codes to access storage units or require higher level authorisation processes) |
| | Provide physical barriers to discourage suicide attempts (e.g. install fences to prevent access to train tracks or railings on bridges, locking windows and limiting roof access); and |
| | Implement file flagging processes or password requirements on potentially distressing files to eliminate inadvertent exposure to distressing content. |
| Minimising exposure to traumatic events or material | Reduce exposure to traumatic materials, particularly if there is no operational need for workers to view or listen to all the materials or consider them in detail (e.g. allow online moderators to remove users based on a single serious breach or encourage officers discovering suspected child abuse material to pass that material to identified investigations without reviewing it. Ensure traumatic materials are sent directly to case managers rather than to an admin email accessible by additional workers) |
| | Use screening software to remove explicit material |
| | Minimise the number of workers exposed to traumatic materials or events (e.g. do not bring unnecessary workers into an investigation or natural disaster area) |
| | Minimise the amount of traumatic materials or events each worker is exposed to (e.g. rotate police officers through different roles to provide periods of respite) |
| | Reduce workloads so workers can investigate thoroughly and provide adequate support to victims (e.g. prevent workers from feeling they 'failed someone'); and |
| | Increase breaks and recovery time after exposure to a traumatic event (e.g. provide time to disconnect from work). |
| Safe work systems and procedures | Provide guidelines and procedures for dealing with incidents, train workers in these procedures and ensure they understand them (e.g. reduce the number of decisions workers make during a traumatic event) |
| | Implement reporting systems for exposure to traumatic or distressing events. Implement systems that prompt supervisors to support workers, trigger a review of the incident and a review of |

| | whether control measures are working as planned |
|------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | Create a safe space for workers to report traumatic or distressing events and deal with these disclosures sensitively and seriously |
| | Implement peer support programs |
| | Implement procedures for providing support after traumatic events (e.g. provide counselling and professional support); and |
| | Embed supervisor training on responding to trauma and where they can get assistance in workplace policies and procedures. |
| The worker | Ensure recruitment and selection practices incorporate a realistic job preview so applicants are aware the role has the potential to expose them to trauma |
| | Monitor the health of your workers following traumatic events, or when dealing with traumatic materials, using processes developed in consultation with workers |
| | Provide training to workers so they understand their role, know how to respond effectively, and know where to access advice and assistance during a traumatic event |
| | Provide training to workers who may be exposed to traumatic events or have a role in supporting workers who are exposed, so they can recognise signs and symptoms of stress and ensure they know where and how to access support |
| | Monitor and support workers following traumatic events (e.g. are there any changes to their behaviours or increased absenteeism); and |
| | Encourage a healthy workplace culture where exposure to traumatic materials or events isn't brushed over or accepted as 'part of the job'. |

Remote or isolated work

Work that is isolated from the assistance of other persons because of the location, time or nature of the work.

Working in environments where there are long travel times, poor access to resources, or communications are limited and difficult.

Note: Some of these examples of hazards may not create psychosocial risks on their own but may do so if combined with other hazards. Some hazards may only create risks on their own when severe. Consider all hazards present and the circumstances to determine what is reasonably practicable to manage the risks.

Remote or isolated work may include:

- working in locations requiring long commutes to work sites
- significant delays to entering or exiting the worksite (e.g. prisons, tower cranes or confined spaces)
- limited access to resources (e.g. supplies are delivered infrequently or there are significant delays in getting additional equipment if needed)
- limited access to recreation or opportunities to escape work issues (e.g. living in workers' accommodation in remote areas)
- reduced access to support networks and lower capacity to meet family commitments (e.g. fly-in fly-out or offshore work)
- working alone (e.g. lone workers on night shift)
- working away from the usual workplace (e.g. working in clients' homes, offsite or from home)
- where there is limited access to reliable communication and technology (e.g. no phone reception or IT systems are frequently offline); and
- difficulties or long delays accessing help in an emergency (e.g. community nurses in remote areas, working in underground mines).

CONTROLLING REMOTE OR ISOLATED WORK

WHS Regulation, section 48

Remote or isolated work

You must manage the risks associated with remote or isolated work, including providing effective communication with the worker carrying out remote or isolated work.

The <u>Code of Practice</u>: <u>Managing the work environment and facilities</u> provides information on how the risks associated with remote or isolated work can be controlled including information on:

- workplace layout and design
- communication systems
- buddy systems
- movement records; and
- training information and instruction.

Example control measures for remote or isolated work include:

- Ensure emergency communication systems in place are suitable for the location
- Ensure accommodation is lockable, with safe entry and exit, meets all relevant structural and stability requirements, and has all fittings, appliances and equipment in good condition
- Use a buddy system, particularly where there is a risk of violence or misadventure, or risks to physical safety
- Ensure workers are trained in, and carry out, situational risk assessments of the safety of their work location before commencing duties (e.g. when they are working in a client's home or in the community)
- Ensure there is appropriate supervision/monitoring systems in place when workers are working in isolation, in the community, or away from the workplace such as:
 - monitored CCTV and enhanced visibility
 - schedule periodic visits by supervisors to visually observe workers and provide appropriate support and assistance
 - procedures to maintain regular contact between workers and supervisors using suitable communication devices
 - automatic warning devices that raise the alarm in an emergency;
 - a 'check-in' at the beginning and 'sign-off' at the end of the working period; and
 - use satellite tracking systems or devices.
- Design emergency response procedures in consideration of location and access to services available (e.g. relevant for medical emergencies and response time, consult with emergency services about possible rescue scenarios and what would be involved); and
- Implement opportunities for regular organisational communication/consultation to ensure workers are provided with up-to-date information and opportunities/avenues to connect with the organisation regularly.

Poor physical environment

Exposure to unpleasant, poor quality or hazardous working environments or conditions.

Note: Some of these examples of hazards may not create psychosocial risks on their own but may do so if combined with other hazards. Some hazards may only create risks on their own when severe. Consider all hazards present and the circumstances to determine what is reasonably practicable to manage the risks.

Poor physical environments may include:

- performing hazardous tasks
- working in hazardous conditions (e.g. near unsafe machinery or hazardous chemicals)
- performing demanding work while wearing uncomfortable PPE or other equipment (e.g. equipment that is poorly fitted, heavy, or reduces visibility or mobility)
- workplace conditions that affect concentration or ability to complete tasks (e.g. high noise levels, uncomfortable temperatures or poor lighting)
- unpleasant workplace conditions such as poorly maintained amenities, unpleasant smells or loud music
- working with poorly maintained equipment (e.g. equipment that has become unsafe, noisy or started vibrating); and

 work-related accommodation, facilities and amenities that cause or contribute to worker fatigue (e.g. conditions are noisy, uncomfortable or stop workers getting enough sleep).

CONTROLLING A POOR PHYSICAL ENVIRONMENT

Like psychosocial hazards, you must eliminate or minimise physical hazards in the workplace as far as is reasonably practicable. Specific duties may also apply under WHS laws, for information on how to manage a poor physical environment please see the <u>Safe Work Australia website</u>.

Appendix B – Harmful behaviours

This appendix provides information on psychosocial hazards related to harmful behaviours. Harmful behaviours include:

- violence and aggression
- bullying
- harassment including sexual harassment or gender-based harassment; and
- conflict or poor workplace relationships and interactions.

These can cause physical and psychological harm to the person they are directed at and anyone witnessing the behaviour.

A single or irregular exposure to these hazards may not create psychosocial risks or the risks may be very low. However, if workers are exposed to a hazard (or a combination of these hazards) over a prolonged period or in a severe way they can cause psychological and physical harm.

The controls provided are examples, you must consider what is reasonably practicable to eliminate or minimise the risks in your workplace.

Identifying harmful behaviours

Overt or extreme forms of these behaviours (such as physical violence) may be easier to identify and are not tolerated in most workplaces. However, more subtle forms like crude language, sexist remarks and an overall workplace culture that is degrading or intimidating may not be taken as seriously and can be more difficult to identify.

Some of the things that may increase the likelihood of workers being exposed to harmful behaviours are set out below. This can help you identify when, where and why these behaviours may happen at work. For example, workplaces with low worker diversity (e.g. the workforce is dominated by one gender, age group, race or culture), some workforce characteristics (e.g. new and young workers, casual workers, workers in minority groups) and a workplace culture which tolerates or ignores harmful workplace behaviours are more likely to experience harmful behaviours.

Workers may be more likely to experience harmful behaviours or be more severely affected by it, because of their sex, gender, sexuality, age, migration status, disability and literacy. The risk of experiencing harm rises when a person faces multiple forms of discrimination. Attributes that make a person more vulnerable to these behaviours can also make workers less likely to report concerns or incidents.

Harmful behaviours can come from a range of sources including:

- External behaviours from customers, clients, patients, members of the public or from other businesses (e.g. between a plumbing and an electrical sub-contractor at the same work site, or a delivery person and a retail worker); and
- Internal behaviours from other workers, supervisors or managers.

Harmful behaviours may be an inappropriate response to other psychosocial hazards (e.g. high job demands or inadequate support). To effectively control risks, you must control the underlying causes as well as directly addressing harmful behaviours.

VIOLENCE AND AGGRESSION

Things that increase the likelihood of violent or aggressive behaviour include:

- providing care or services to people who are distressed, confused, afraid, ill, affected by drugs or alcohol or receiving unwelcome or involuntary treatment
- enforcement activities (e.g. the activities of police, prison officers or parking inspectors)
- · working in high crime areas
- handling valuable or restricted items (e.g. cash or medicines)
- poor visibility in the workplace (e.g. poor lighting or barriers)
- restricted movement in the workplace (e.g. limited exit points)
- working alone, in isolation or in a remote area with the inability to call for assistance
- working offsite or in the community
- working in unpredictable environments (e.g. where other people may pose a risk to workers' safety such as at a client's home)
- interacting with customers, either face-to-face, on the phone or online; or
- service methods or policies that cause or escalate frustration, anger, misunderstanding or conflict (e.g. low staffing levels, customer service policies, setting unreasonable expectations of the services an organisation or workers can provide).

BULLYING

Things that increase the likelihood of bullying include:

- presence of other psychosocial hazards:
 - o high job demands
 - low job control
 - low support
 - o organisational change, such as restructuring or significant technological change
 - o lack of role clarity; or
 - o poor organisational justice.
 - leadership or management styles:
 - autocratic behaviour that is strict and directive and does not allow workers to be involved in decision making
 - behaviour where little or no guidance is provided to workers or responsibilities are inappropriately and informally delegated to subordinates; and
 - abusive and demeaning behaviour that may include inappropriate or derogatory language, or malicious criticism and feedback, and tolerance of this behaviour;
 - systems of work
 - lack of resources or training
 - o inappropriate work scheduling, shift work and poorly designed rostering
 - o unreasonable performance measures or timeframes
 - poor workplace relationships
 - poor communication
 - isolation
 - low levels of support; or
 - o work group hostility.

HARASSMENT INCLUDING SEXUAL HARASSMENT

Things that increase the likelihood of harassment include:

- acceptance of inappropriate behaviour (e.g. racially or sexually crude conversations, innuendo or offensive jokes are part of the accepted culture)
- power imbalances along gendered lines (e.g. workplaces where one gender holds the majority of management and decision-making positions)
- workplaces organised according to a strict hierarchical structure (e.g. police and enforcement organisations, medical and legal professions)
- use of alcohol at work activities and attendance at conferences and social events as part of work duties, including overnight travel
- workers are isolated, in restrictive spaces like cars or working from remote locations with limited supervision or restricted access to help and support
- working from home which may provide an opportunity for covert sexual harassment to occur online or through phone communication
- interacting with customers, either face-to-face, on the phone or online; and
- poor understanding among workplace leaders of the nature, drivers and impacts of sexual harassment.

While anyone can experience harassment there are certain groups who are more likely to experience it. Some workers may be at greater risk because of their age, gender, sexuality, migration status, disability and literacy.

CONFLICT OR POOR WORKPLACE RELATIONSHIPS AND INTERACTIONS

Things that increase the likelihood of conflict or poor workplace relationships include:

- culture of tolerating swearing, name calling, spreading rumours or rudeness within the workplace
- lack of policies or processes to handle reports of unacceptable behavior; and
- the presence of other psychosocial hazards (workers are more likely to be uncivil when they are stressed).

Controlling risks from harmful behaviors

Behaviors such as those listed above are known to cause harm. You must put control measures in place to eliminate or minimise risks so far as is reasonably practicable.

This section provides examples of control measures for managing the risks of violence, aggression, sexual harassment and bullying at the workplace.

Note: These are examples only. You must identify and implement control measures that eliminate or minimise the risks in your workplace, so far as is reasonably practicable.

PHYSICAL WORK ENVIRONMENT AND SECURITY

The physical work environment can affect the likelihood of violence, aggression, harassment and bullying occurring and the ability to respond if it does happen. Consider the following control measures which may provide the highest protection for workers.

Security

- Security personnel or night-time security patrol
- Video surveillance
- Fixed and portable alarm systems
- police body armour and face protection
- Effective air-conditioning so that workers do not have to have the windows down
- Communication systems like phones, intercoms and alarm systems are in place, regularly maintained and tested; and
- Ensuring vehicles are fit for purpose (e.g. have central locking devices, tracking devices such as GPS systems to allow drivers in distress to be located, lighting inside the vehicle to allow the driver to be aware of passenger behaviour, vehicles are well maintained so they do not break down in unsafe locations or times).

Access

- Controlling access to the premises (e.g. electronically controlled doors with viewing panels that allow surveillance of public areas before the doors are opened from the inside)
- Preventing public access to the area when people are working alone or at night (e.g. via a security card or code, asking guests to leave the room while workers clean)
- Providing facilities and amenities which give privacy and security (e.g. private and secure change rooms or facilities for workers to use which are separate from customers)
- Intercom system for communication
- Separating workers from the public with fixed or removable barriers (e.g. high counters, furniture, screens on counters or screens between a driver and passenger);
- Installing a service window for night transactions and systems like pay-at-the-pump; and
- Where practicable, providing a workspace for workers who are not able to work from home.

Visibility

- Ensuring internal and external lighting provides good visibility, including in car parks
- Corner mirrors so that workers can see what/who may be around the corner
- Arranging furniture and partitions within the workplace to ensure good visibility of service areas, improve natural surveillance and avoid restrictive movement; and
- Improving natural surveillance in areas such as offices, storerooms and other segregated areas (e.g. using semi opaque glass or screens).

Environment

- Ensuring there are no areas where workers could become trapped, such as rooms with keyed locks
- Implementing appropriate temperature and noise controls, such as in waiting areas to reduce customer frustration
- Securing any objects that could be thrown or used to injure someone
- Providing workers and others with a safe place to retreat. In other situations, it may be

- possible to move the person behaving inappropriately (e.g. an aggressive student could be removed from the classroom while the behaviour continues); and
- Ensuring a safe working environment for workers during travel (e.g. workers being in a vehicle together), at conferences, off site, at client or customer premises, and any other location where work is performed.

SAFE WORK SYSTEMS AND PROCEDURES

Some safe work systems and procedures are administrative controls that must be part of your approach to managing risks at your workplace. Consider these after your higher-order control measures (isolation, substitution and engineering controls) and use them in combination with more effective controls.

Communication

- Communicate with workers when they are working in the community or away from the workplace (e.g. a supervisor regularly checking in with the worker throughout their shift)
- Clearly define jobs and seek regular feedback from workers about their role and responsibilities
- Clearly communicate to clients and customers that any form of violence, aggression harassment or bullying is not tolerated (e.g. in service agreements, contracts or on signs)
- Manage expectations of clients and customers by clearly communicating the nature of the products or services you are providing (e.g. online and using signage); and
- Put up signs at the workplace (e.g. zero tolerance of aggression and violence; limits on products or services; security cameras are in use; or limited cash held on the premises).

Procedures

- Ban or refuse service to persons with a history of poor behaviour (e.g. patrons at pubs or clients gyms). If service is necessary, such as for medical care, put in place additional measures to protect workers and others
- Provide alternative methods of customer service to eliminate face-to-face interactions (e.g. online or click-and-collect services, or no contact delivery drops)
- Establish procedures for dealing with harmful behaviour from customers or clients and how workers and managers can respond
- Limit the amount of cash, valuables and medicines held on the premises and handle them securely (e.g. only accept cashless payments) see the Safe Work Australia <u>Guide for</u> <u>Transporting and Handling Cash</u> for more information
- Use face shields where spitting or intentionally coughing is a risk
- Avoid the need for workers to work alone where possible (e.g. working in pairs, closing the business with security personnel present, or providing a safe escort to a worker's transport)
- Provide supervision of work and support for workers, especially new, young and inexperienced workers
- Procedures for working in isolation and uncontrolled environments (e.g. carrying out situational risk assessments to determine at each visit the safety of a client's home before commencing duties)
- Provide a sufficient number of workers (e.g. during peak periods of customer attendance and for the level of care needed for clients)
- Alternate tasks in the workplace particularly tasks requiring high levels of customer

- interaction with other work tasks and ensure workers have regular breaks if aggression or incivility is likely
- Encourage workers to keep records and screen shots if harmful behaviour occurs online or through phone communication and report the behaviour to their supervisor
- Assess risks of client aggression and violence and whether additional control measures are required for dealings with some clients
- Implement management plans where a client is known to have a history of aggression or violence. Develop the plan in consultation with appropriately qualified people and communicate it to all relevant workers
- Reduce waiting times and missed calls (e.g. by training 'relief' workers to take calls or transferring calls to other areas)
- Encourage workers to escalate problem calls to senior workers
- Encourage workers to report incidents and behaviours of concern; and
- Provide a range of accessible and user-friendly ways to make a report informally, formally, anonymously and confidentially.

Information and training

- Improve role clarity by ensuring workers have well-defined roles and clear expectations
- Provide adequate resources and training to workers so they are able to perform their role confidently and competently
- Provide information on the standards of behaviour expected in the workplace, including the use of social media or other technologies
- Train workers in how to deal with difficult customers, conflict resolution and de-escalation techniques, when and how to escalate issues to managers or supervisors, and procedures to report incidents
- Train managers and supervisors on how to deal with difficult customers and conflict resolution when issues are escalated
- Plan for regular handover and information exchange with workers, other agencies, carers and service providers
- Understand client condition/disability/triggers/care and behaviour management plans
- Ensure workers understand how to make a report, their right to representation and the support, protection and advice available
- Make it clear that victimisation of those who make reports will not be tolerated; and
- Train key workers (contact persons) to receive reports and give support and advice.

Policies

- Implement appropriate workplace policies as part of managing WHS risks
- Set, model and enforce acceptable behaviour standards for all people in the workplace
- Foster a positive and respectful work culture where violence, aggression, harassment and bullying are not tolerated
- As power imbalances and inequality increase the risk of gendered and sexual harassment, consider implementing policies and strategies to address gender inequality, lack of diversity and power imbalances at the workplace
- For work-related events, reinforce workplace policies and behaviours expected of
 workers, ensure responsible service of alcohol policies are followed and that workers
 know who to turn to if they experience or witness inappropriate behaviour at the event

- Avoid sexualised uniforms and ensure clothing is practical for the work undertaken
- Act in a consistent manner when dealing with reports of violence, aggression, harassment and bullying, including providing sufficient and appropriate feedback to workers who have raised concerns
- Allow workers to refuse or suspend service if people fail to comply with the expected standard of behaviour
- Ensure processes and systems for reporting and responding to incidents are widely communicated and regularly reviewed; and
- Provide supportive, consistent and confidential responses to reports.

Review

- Regularly evaluate work practices, in consultation with workers and their representatives, to see if they contribute to poor behaviours
- · Review control measures after incidents or changes in behaviour
- Review and monitor workloads, staffing levels and time pressures; and
- Collect de-identified details of all reports, including those that are not pursued formally by the complainant, to help you identify systemic issues at the workplace.

Appendix C - Risk register

Location: Click here to enter text.

Date: Click here to enter a date.

| Hazard | How frequently are workers exposed to this hazard? | How long does this exposure last? | How severe is their exposure? | Are other hazards present this may interact with? | How effective are the current controls? | What further controls are required? | Actioned by | Date Due | Date Complete | Maintenance and review |
|--------------------------------------------------------------|----------------------------------------------------|--------------------------------------------|---------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|--------------------------|----------------------------|-----------------------------|-------------------------------------------------------|
| E.g. High work demand (end of financial year sales) | Once a year | 1 month | Moderate, most staff are unable to complete essential tasks and report feeling stressed. | Yes, aggressive customers and low support from supervisors. | Moderately, workers are encouraged to leave non-essential tasks but still struggle to keep up with demands. | Additional workers to be assigned to busy shifts. | J. Blogs | 31/05/2022 | Click here to enter a date. | To be reviewed after first week of this year's sales. |
| Click here to enter text | Click here to enter text | Click here to enter text | Click here to enter text | Click here to enter text | Click here to enter text | Click here to enter text | Click here to enter text | Click here to enter a date | Click here to enter a date | Click here to enter text |
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