Managing psychosocial hazards at work

Code of Practice

NTWorkSafe | NORTHERN TERRITORY GOVERNMENT
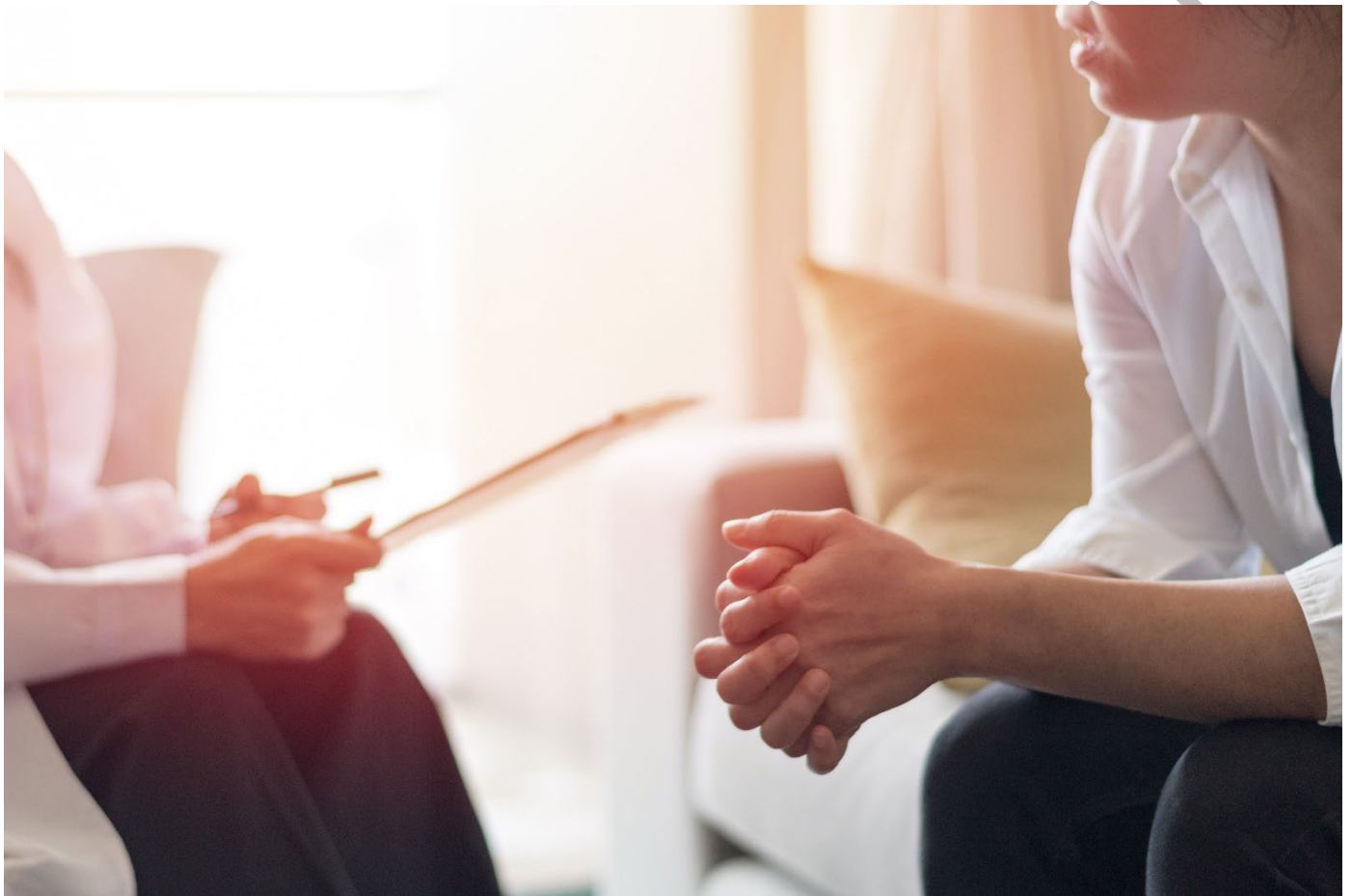
Application in the Northern Territory

This code of practice was approved by the Attorney-General and Minister for Justice under section 274(1) of the *Work Health and Safety (National Uniform Legislation) Act 2011* on XXXX and published in the Northern Territory Government Gazette (No. X) on XXXX.

The Northern Territory code of practice is based on the national model code of practice developed by Safe Work Australia.

This publication contains information regarding work health and safety, including some of your obligations under the *Work Health and Safety (National Uniform Legislation) Act 2011* administered by NT WorkSafe. The information provided is guidance material which must be read in conjunction with the appropriate legislation to ensure you understand and comply with your legal obligations.

Disclaimer

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 (National Uniform Legislation) Act 2011* (the WHS Act).

An approved code of practice provides practical guidance on how to achieve the standards of work health and safety required under the WHS Act and the *Work Health and Safety (National Uniform Legislation) Regulations 2011* (the WHS Regulations) 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 Regulations, 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 Regulations. 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 Interpretive Guideline: *The meaning of 'reasonably practicable'*.

Compliance with the WHS Act and WHS Regulations may be achieved by following another method if it provides an equivalent or higher standard of work health and safety 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 of practice 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 of practice may be a useful reference for other persons interested in the duties under the WHS Act and WHS Regulations.

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

How to use this Code of Practice

This code of practice includes references to the legal requirements under the WHS Act and WHS Regulations. These are included for convenience only and should not be relied on in place of the full text of the WHS Act or WHS Regulations.

The words 'must', 'requires' or 'mandatory' indicate a legal requirement exists and must be complied with. The word 'should' is used in this code of practice to indicate a recommended course of action, while 'may' is used to indicate an optional course of action.

1. Introduction

The WHS Act defines 'health' to include both physical and psychological health. A PCBU has a primary duty to manage risks to both physical and psychological health so as to ensure, as far as is reasonably practicable, the health and safety of workers and other persons who may be affected by work carried out arising from the business or undertaking.

Psychosocial hazards can cause psychological and physical harm. On average, work-related psychological injuries have longer recovery times, higher costs, and require more time away from work than physical injuries. Managing the risks associated with psychosocial hazards not only protects workers, it also decreases the disruption associated with staff turnover and absenteeism, and may improve broader organisational performance and productivity.

1.1. Psychosocial hazards at work

WHS Regulations 55A

Meaning of psychosocial hazards

Psychosocial hazards are hazards that:

- arise from or relate to:
    - the design or management of work; or
    - the working environment; or
    - plant[1] at a workplace; or
    - workplace interactions or behaviours; and
- may cause psychological harm, whether or not they may also cause physical harm.

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

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

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[1] 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.

include musculoskeletal injury, chronic disease, and physical injury following fatigue-related workplace incidents.

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

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.

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

1.2. Work health and safety duties

Person conducting a business or undertaking

WHS Act section 19

Primary duty of care

WHS Regulations Division 11

Psychosocial risks

WHS Regulations Part 3.1

Managing risks to health and safety

As PCBU, you 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 manage psychosocial risks in accordance with Part 3.1 of the WHS Regulations. This includes eliminating psychosocial risks in the workplace, or if that is not reasonably practicable, applying one or more controls to minimise these risks.

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

The WHS Regulations include specific requirements for PCBUs to manage risks arising from psychosocial hazards. A duty holder must:

- identify reasonably foreseeable hazards that could give rise to psychosocial risks
- eliminate psychosocial risks, so far as is reasonably practicable

- if it is not reasonably practicable to eliminate the risks – <mark>implement control measures in accordance with the hierarchy of controls</mark> to minimise the risks so far as is reasonably practicable
- maintain 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, you 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
    - facilities for the welfare of workers
- the design and layout and environmental conditions of workers' accommodation
- the plant, substances and structures at the workplace
- workplace interactions or behaviours, and
- the information, training, instruction and supervision provided to workers.

Officers

> **WHS Act section 27**
>
> Duty of officers

Officers, 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 Regulations. 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 and 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 Regulations, and
- verify the provision and use of the resources and processes mentioned above and that they are performing effectively.

For information on officers and their duties see the Interpretive Guideline: *The health and safety duty of an officer under section 27*.

Workers

> **WHS Act section 28**
>
> Duties of workers

Workers must take reasonable care for their own psychological and physical health and safety, and take reasonable care 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 cooperate 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 behaviour aimed at preventing bullying and harassment.

Other persons at 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 Regulations.

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

Other relevant duties

Other relevant duties under WHS laws are set out throughout this code of practice. See Consulting workers, Consulting, cooperating and coordinating activities with other duty holders, Information, training, instruction and supervision, and Remote or isolated work.

WHS laws do not operate in isolation and other laws may also apply. For example, industrial relations, criminal, anti-discrimination, privacy and workers' compensation laws.

1.3. Consultation, cooperation and coordination

Consulting workers

> **WHS Act section 47**
>
> Duties to consult workers

As a PCBU, you 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 work health and safety matter. You must consult with workers when assessing risks or making decisions about the psychosocial risks to health and safety including what control measures are implemented.

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.

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.

You must consult with all workers, in particular workers with vulnerabilities, who are likely to be directly affected by particular psychosocial hazards. Workers from diverse backgrounds may be exposed to different psychosocial hazards. For example, women, young workers, those from culturally and linguistically diverse backgrounds, LGBTIQA+ workers and workers with disability are more likely to experience workplace sexual harassment and should be provided with the opportunity to participate in these consultations (which may take different forms), along with all workers who are likely to be directly affected.

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

WHS Act section 48

Nature of consultation

All consultation must include any Health and Safety Representatives (HSRs) representing your workers. References to consultation with workers in this code of practice includes consultation with any HSRs.

You must provide workers with a reasonable opportunity to raise psychosocial health and safety issues, express their views and contribute to decision-making. Effective methods of consultation can vary according to the needs of your workers, workplace size, the distribution of workers across sites and shifts, the nature of the work and the type of hazards in a workplace.

When consulting with your workers you must:

- share relevant information
- give workers a reasonable opportunity to express their views, raise psychological health and safety issues and contribute to the decision-making process
- take those views into account before making decisions on health and safety matters
- advise workers of the outcome of consultations in a timely manner

Management commitment and open communication between managers and workers is important in achieving effective consultation. Workers are more likely to engage in consultation if you actively encourage them to share their knowledge and experiences, and they are confident their concerns about psychosocial health and safety will be taken seriously. You should also encourage workers to report psychosocial hazards so risks can be managed before an injury occurs.

You may need to use multiple methods of consultation for psychosocial hazards, and must consider whether existing consultation arrangements are appropriate for psychosocial risks. If new consultation arrangements are required, these must be decided in consultation with workers and their representatives.

Examples of consultation methods include:

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

Workers from culturally and linguistically diverse backgrounds 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. You should consider consultation processes that address such concerns like anonymous surveys or reporting, particularly where workers may be concerned raising safety issues could impact on their employment or career progression.

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

> **WHS Act section 49**
>
> When consultation is required

As a PCBU you must consult with workers when:

- identifying hazards and assessing risks to psychological 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
- 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
    - providing information and training to your workers

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. Further guidance is available in the Code of Practice: *Work health and safety consultation, cooperation and coordination*.

Consulting, cooperating and coordinating activities with other duty holders

> **WHS Act section 16**
>
> More than one person can have a duty

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.

> **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
- 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 the 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.*

1.4. The risk management process

The risk management process described in the Code of Practice: *How to manage work health and safety risks* can be applied to the management of psychosocial hazards. To meet your duties to ensure health and safety, you must eliminate or minimise psychosocial risks as much as is reasonably practicable.
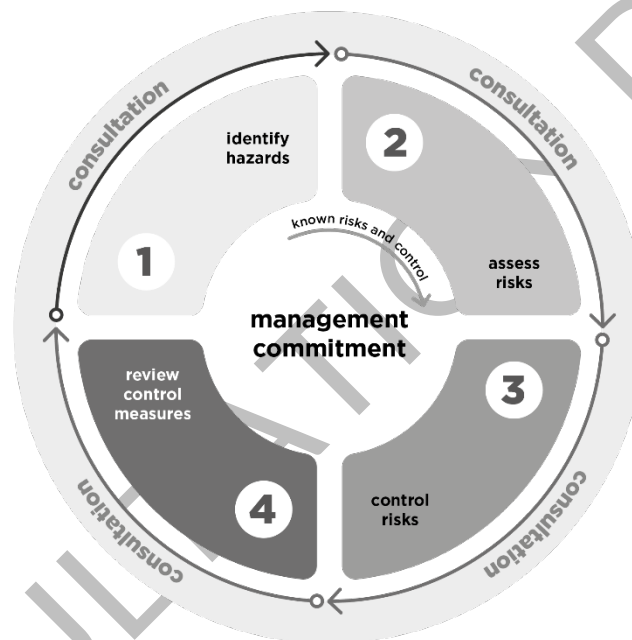
The risk management process involves four steps:

1. **Identify hazards** - find out what could cause harm.
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.
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:
   - you must eliminate risks, if reasonably practicable to do so
   - 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
   - ensure those control measures remain effective over time
4. **Review control measures** to ensure they are effective, used correctly and working as planned, and make changes as required.

All of these steps must be supported by consultation with workers and their representatives.

Risk management is a proactive process that helps you respond to change and facilitate continuous improvement in your business. It should be planned, systematic and cover all reasonably foreseeable psychosocial hazards and associated risks. 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, you should consider psychosocial hazards at the design phase when planning an organisational restructure.

The risk management process may be implemented in different ways depending on the size and nature of your 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.

Leadership and management commitment

Effective risk management requires genuine commitment and engagement from senior leaders and managers. Organisational leaders, through their governance arrangements and resourcing decisions, actively shape the organisation and the way work is undertaken. Their decisions directly and indirectly impact how effectively you can control psychosocial risks.

Commitment can be built by ensuring leaders understand their duties under WHS laws, how and why to apply the risk management process to effectively manage psychosocial hazards, and the roles of various organisational leaders (e.g. human resources and WHS managers).

2. 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 your 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.

2.1. Common psychosocial hazards

Below is a list of some common examples of 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
Job demands	Intense or sustained high mental, physical or emotional effort required to do the job.
	Unreasonable or excessive time pressures or role overload.
	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.
	Sustained low levels of physical, mental or emotional effort is required to do the job.
	Long idle periods while high workloads are present, for example where workers need to wait for equipment or other workers.
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.

Hazard	Descriptions
	Levels of autonomy not matched to workers' abilities.
Poor support	Tasks or jobs where workers have inadequate support including practical assistance and emotional support from managers and colleagues, or inadequate training, tools and resources for a task.
Lack of role clarity	Uncertainty, frequent changes, conflicting roles or ambiguous responsibilities and expectations.
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.
Inadequate reward and recognition	Jobs with low positive feedback or imbalances between effort and recognition. High level of unconstructive negative feedback from managers or customers. 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.
Traumatic events or material	Experiencing fear or extreme risks to the health or safety of themselves or others. Exposure to natural disasters, or seriously injured or deceased persons. 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.
Poor physical environment	Exposure to unpleasant or hazardous working environments.
Violence and aggression	Violence, or threats of violence from other workers (including workers of other businesses), customers, patients or clients (including assault). Aggressive behaviour such as yelling or physical intimidation.
Bullying	Repeated unreasonable behaviour directed towards a worker or group of workers that creates a risk to health and safety.[2] This includes bullying by workers, clients, patients, visitors or others.
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. 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.

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[2] Bullying is defined in Safe Work Australia Guidance and the *Fair Work Act 2009 (Commonwealth)*.

Hazard	Descriptions
	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.

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

2.2. How to identify psychosocial hazards

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

As well as identifying common hazards, ensure your process identifies hazards for less common but serious incidents, such as sexual or physical assault.

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

Consult your workers

You must consult with your workers when identifying hazards to health and safety arising from the work they carry out or are going to carry out.

If your workers are represented by HSRs you 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.

Your 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 or gender-based harassment or discrimination
- disgruntled or 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
- distressed, unable to sleep, or traumatised by exposure to traumatic situations or content
- coerced to work beyond their capacity
- upset, angry or critical that information, training or resourcing is inadequate.

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.

Use surveys and tools

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

- anonymity is important. Surveys or tools protect workers from stigma or other adverse outcomes when reporting hazards or concerns, providing the organisation is large enough that anonymity can be assured
- workers are physically dispersed (e.g. they work across multiples sites or shifts)
- you need to consult with a large number of workers
- workers need time to consider your questions and their response, or
- workers may struggle to understand or otherwise participate in other forms of consultation.

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

You can seek advice on the tools available from the work health and safety 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, such as the People at Work tool.

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)
- how people interact with each other (e.g. are workers, customers and clients respectful, or are harmful behaviours present).

In some circumstances, poor workplace behaviours 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 behaviours, including lower level (but still harmful) behaviours like name-calling, teasing, sexual or gendered jokes, and crude language.

Review available 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, turnover data and exit interviews
- health and safety committee meeting records
- 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.

Information and advice about psychosocial hazards and risks relevant to particular industries and work activities are available from the work health and safety regulator, industry associations, unions, technical specialists, cultural advisers, 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.

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
- 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.

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

- treating all reports of psychosocial hazards seriously and appropriately
- 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)
- ensuring processes and systems for reporting and responding to complaints of bullying, harassment or other poor behaviours are appropriate, transparent and well understood
- acting decisively to control the risks your workers identify

Your hazards and risks reporting system should be appropriate and proportional for your organisation and the risks in your workplace. For example, a large organisation with previous instances of violent behaviour should consider a formal system with documented procedures. In contrast, a small business with no previous instances of violent or aggressive behaviour may not require a formal system, and could instead encourage workers to discuss hazards with supervisors as required and have a method of reporting and recording details.

3. Assess the risks

3.1. When should a risk assessment be conducted?

A risk assessment can help you determine how severe risks are, and therefore what is reasonably practicable in managing the risks. If you already know what the risks are and how to control them effectively, you can implement the controls without undertaking a risk assessment and then check to confirm these have been effective.

You should carry out a risk assessment for any hazards you have identified 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

When assessing risk, you must consult with workers and their representatives. Further information on risk assessments is available in the Code of Practice: *How to manage work health and safety risks*.

3.2. How to assess psychosocial risks

To assess the risk of harm, you need to identify the workers affected and consider the duration, frequency and severity of their exposure. Appendix C may assist you to capture this information.

Once you have identified all the hazards you should assess the risks. To do this, 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?

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. For example, a worker exposed to aggressive customer behaviour is more likely to be harmed if at that time they do not have other workers present to support them and do not have the control to alter the way they work to de-escalate the situation. 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. For example, a single exposure to a severe psychosocial hazard (e.g. a violent incident) is more likely to harm workers if they are also exposed to chronic (long duration), but less severe hazards (e.g. ongoing low support).

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.
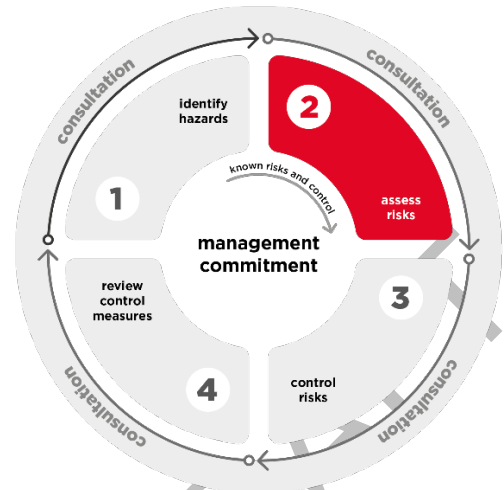
Barriers that may put some workers at higher risk

Like for physical hazards, some workers may be at greater risk from psychosocial hazards due to barriers to understanding or participating in safety processes. 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), or
- previous exposure to a hazard.

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

Consulting your workers will assist you to identify any groups who are at greater risk, and whether there are additional reasonably practicable controls you must implement to eliminate or minimise the risks for these workers.

People at Work risk assessment survey

People at Work is a free and validated Australian psychosocial risk assessment, designed to assist employers to identify psychosocial hazards and risks through an anonymous worker survey. It is available to all Australian workplaces with a minimum of 20 workers.

Visit peopleatwork.gov.au to use the tool.

The site provides step-by-step instructions for setting up an organisational account, administering the survey and interpreting the results. Survey responses are anonymous, and organisations can view the results via a comprehensive or simplified report.

4. Control the risks

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

You must eliminate risks to health and safety if it is reasonably practicable to do so. If it is not reasonably practicable to eliminate the risks, you must minimise risks so far as is reasonably practicable. You must implement control measures in accordance with the hierarchy of controls.

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 Appendix A and Appendix B.

To determine what is reasonably practicable to manage psychosocial risks:

1. identify as many possible control measures as you can
2. consider which of these control measures are most effective, and
3. consider which controls are reasonably practicable in the circumstances.
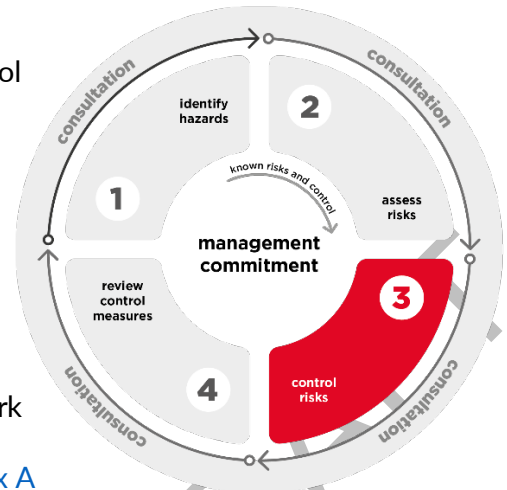
4.1. The hierarchy of control measures

WHS Regulations 36

Hierarchy of control measures

To meet your duties to ensure health and safety, you must manage psychological risks in accordance with the hierarchy of controls in Part 3.1 of the WHS Regulations, to eliminate or minimise psychosocial risks so far as is reasonably practicable.

The hierarchy of controls ranks control measures from the highest level of protection and reliability to the lowest. You must always aim to eliminate the risk, which is the most effective control. If this is not reasonably practicable, you must minimise the risk by working through the other alternatives in the hierarchy.

The lower levels in the hierarchy, i.e. administrative controls and personal protective equipment (PPE), do not control the hazard at the source. Because they rely on human behaviour for success, they are less effective at minimising risk than higher order controls. Unless combined with higher level controls, lower level controls should only be used as a short-term interim measure until a more effective way of controlling the risk can be implemented, or when there are no other practical control measures available.

Elimination

You must always aim to eliminate the hazard, which is the most effective control and the only way to eliminate the risk. The best way to do this is by, firstly, not introducing the hazard into the workplace through careful environmental, organisational and job design at the planning stage of a product, process or place used for work.

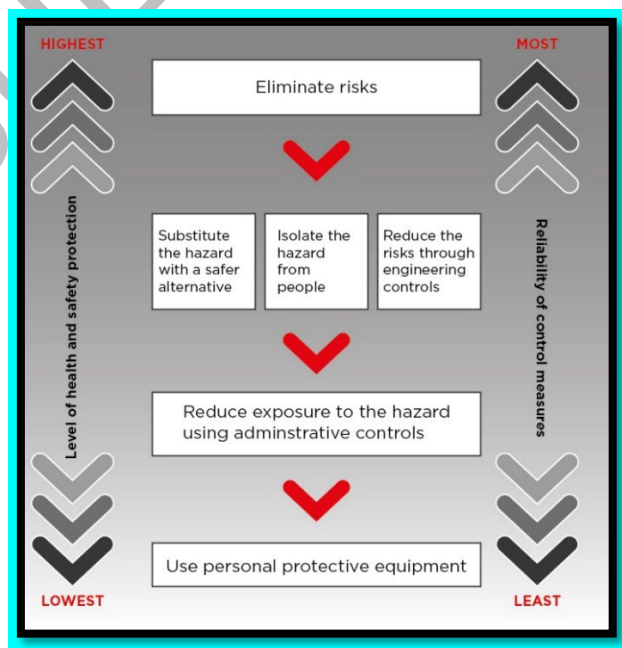It may not be reasonably practicable to eliminate a psychosocial hazard if doing so means that you cannot make the end product or deliver the service. If it is not reasonably practicable to eliminate the hazards and associated risks, you must minimise the risk by working through the other alternatives in the hierarchy.

Substitution, isolation and engineering controls

If it is not reasonably practicable to eliminate a psychosocial hazard and associated risks, you must minimise the risks using one or more of the following approaches, so far as is reasonably practicable.

Substitute the hazard with something safer – changing the design or system of work by wholly, or partly, replacing a hazard or hazardous work practice with something that gives rise to a lesser risk.

Isolate the hazard from people – using distance, access control systems or barriers to physically separate workers from a psychosocial hazard.

Engineering controls – using physical controls such as a mechanical device or process, and design and features of the work environment to minimise the risk.

Administrative controls

If risk remains after applying substitution, isolation or engineering control measures, it must be minimised by implementing administrative controls, so far as is reasonably practicable. It may also be necessary to also implement administrative controls to ensure the effective implementation of higher level controls.

Administrative controls include work methods, organisational policies and 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.

Personal protective equipment

If risk remains after applying substitution, isolation, engineering and administrative control measures, you must minimise the remaining risk by ensuring the provision and use of suitable PPE, so far as is reasonably practicable. 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. PPE should be used in conjunction with administrative controls such as the provision of information, instruction and training to workers and/or the implementation of safe work procedures.

Combining risk controls

In most cases, a combination of control measures will be the most effective approach to minimising the risk. A combination of control measures may be used if a single control is not sufficient to eliminate or minimise psychosocial risk. It may also be necessary to implement lower-level controls to ensure the effective implementation of higher level controls.

4.2. Matters to consider when controlling risks

> **WHS Regulations 55D**
>
> Determining control measures for psychosocial risks

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

In determining what control measures are appropriate, you 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, including:

- **the design of work, including job demands and tasks involved**

  Considering how the work is designed will support you to eliminate hazards at the source and at the organisational level.

  Your workers should have an appropriate amount of work to match their skills and experience. For example, a job designed with too much work for a worker of that skill level to complete with the resources provided, or tasks that do not match that worker's skillset will create hazards. Matching tasks to workers' skills and scheduling non-urgent tasks for times of lower demand may assist to control risks.

- **systems of work, 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 does not allow workers to seek assistance from supervisors, or that allocates tasks without regard for other work demands may introduce hazards. A system of work which provides for support and manages job demands may assist to control risks.

- **the design and layout and environmental conditions, of the workplace, including safe means of entering and exiting the workplace and welfare facilities**

  A poor physical working environment can be a psychosocial hazard, however the way a workplace is set up can also control other psychosocial hazards.

  For example, ensuring workers can get away from aggressive customers or can observe when another worker may need assistance.

- **the design and layout, and environmental conditions of workers' accommodation**

Like the working environment, accommodation provided for workers can introduce or control psychosocial hazards.

For example, worker accommodation which does not provide adequate privacy or security can contribute to the risk of violence or harassment. Well-designed accommodation can help control these risks.

- **plant, substances and structures at the workplace**

Plant (e.g. machinery, equipment, appliances and tools), structures and substances used at work can introduce psychosocial hazards where they create a physical hazard that is not adequately controlled. For example, plant can create loud noises, dust and vibrations which creates poor physical environments and contributes to psychosocial risks.

Well-designed and maintained plant can prevent these hazards but can also be used to control other psychosocial hazards. For example, safe plant that allows work to be performed more efficiently can reduce high work demands.

- **workplace interactions or behaviours**

The way workers interact with each other and other persons in the workplace, their behaviour and relationships can introduce psychosocial hazards. However, supportive leadership, positive relationships and professional and respectful interactions can help to minimise a range of psychosocial hazards.

Poor organisational culture can hamper efforts to improve work health and safety by preventing workers seeking and providing support and discouraging workers from reporting hazards and participating in consultation. Leaders demonstrating poor behaviour are likely to contribute to poor organisational culture.

- **information, training, instruction and supervision provided to workers**

Information, training, instruction and supervision may be necessary to implement control measures effectively (see Section 4.4 for further information and relevant duties). They may also assist in controlling some psychosocial risks, for example where low role-clarity is creating a risk, information and training on the worker's role will assist in controlling the risks.

Care should be taken to ensure control measures do not introduce new psychosocial hazards, for example by applying a trauma-informed approach to training about sensitive issues such as bullying, violence and aggression, or sexual harassment.

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 particular 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 a 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.

Addressing risks to individual workers

It may be necessary to accommodate the needs of an individual worker, so far as is reasonably practicable, to prevent harm where the worker has disclosed those needs or you are aware. For example, a worker with an injury or disability may need a quiet work area or different equipment to do their work.

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. As well as making changes for individual workers you must still eliminate or minimise psychosocial risks for all workers so far as is reasonably practicable.

4.3. Identify and select control measures

Identify possible control measures

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.

Consider which control measures are most effective

From the possible control measures you have identified, consider which control or combination of controls will be most effective.

You must first aim to eliminate the risks, so identify any control measures which would achieve this. Then order the remaining controls, or combinations of controls, from most to least effective at minimising the risks, in accordance with the hierarchy of controls. Controls that are reliable and offer the highest level of protection are the most effective.

Minimising the risks can be achieved by changing the:

- design of work, including job demands and tasks involved
- systems of work, for example:
    - allocating tasks to match skills
    - ensuring sufficient time to complete tasks
    - support from supervisors and other workers
- work environment and conditions
- workplace interactions including ensuring respectful behaviours and relationships
- objects or tools used in the task, for example ensuring plant, substances and equipment are safe and fit for purpose

Physical risks contributing to psychosocial risks can be minimised through relevant substitution, isolation and engineering controls.

Administrative controls and PPE are the least reliable controls and provide the lowest level of health and safety protection. You should consider these last and use them in combination with more effective controls.

For example, policies may be ignored, systems of work may not be understood and followed, and PPE may not always be worn. Further controls, such as supervision, may be needed to make a control more likely to be effective.

Select reasonably practicable control measures

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

- the likelihood of the psychosocial hazard or the risk occurring
- the degree of harm that might result from the hazards or the risks
- the availability and suitability of ways to eliminate or minimise the risks
- 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
- 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.

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.

Psychosocial hazards can interact or combine with other psychosocial hazards 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.

4.4. Implementing control measures

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

Test control measures

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

You should allow enough time for your workers to adjust to changes (e.g. new work processes) before assessing the effectiveness of control measures. At this stage, you should frequently check with your 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 39**
>
> Provision of information, training and instruction

As you are planning to implement control measures, you 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, you must provide them with any training necessary to ensure safety. This may include training, so they know what to do 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. 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.

Maintenance

You 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. You should decide what maintenance a control measure will require when you implement the control and establish a schedule for routine checks and maintenance. You 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.

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.

You may have separate policies or one policy that covers several work health and safety issues.

Where you have policies relating to psychosocial risks, these must be developed in consultation with your 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

You 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
- designing the management process in a way that eliminates or minimises psychosocial risks

Addressing psychosocial hazards contributing to unsatisfactory performance or poor behaviour

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 or training to perform the role
- lack of clarity on the role and requirements
- poor interpersonal relationships

Eliminating or minimising psychosocial risks in the management process

You must ensure you have eliminated or minimised any risks in your 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.

5. 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.

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 your existing control measures are effective, if your 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. You can use the same methods as in the initial hazard identification step to check control measures. You must also consult your workers and their HSRs.

The person reviewing your 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.

6. Recording the risk management process and outcomes

You should record your risk management process and the outcomes, including your consultation with workers. This allows you to demonstrate you have met your work health and safety 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: *How to manage work health and safety risks* or in Appendix C.

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 work health and safety 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.

7. Responding to reports of a psychosocial risk or incident

While most psychosocial hazards should be identified during the routine systematic risk management process, sometimes the first time you may become aware of an issue is when it is reported.

Workers may report psychosocial hazards in a variety of ways, including:

- during discussions between workers, supervisors and managers
- talking to a union representative and/or HSR
- in emails, text messages or letters about a complaint or grievance
- entering issues into a risk or incident register
- workers' compensation claims

Early reporting of psychosocial hazards and risks should be encouraged so they can be managed before serious harm occurs.

The WHS Act prohibits any person from engaging in conduct which is discriminatory, coercive or misleading towards workers who report a work health and safety matter, including about psychosocial risks or incidents.

7.1. Conducting work health and safety investigations

Any work health and safety investigations into reports of incidents involving psychosocial hazards should primarily aim to identify 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, you should consider the level of risks involved, the complexity of the situation, the seriousness of the actual or potential harm, and the 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. You can seek advice from the work health and safety regulator, your industry body or a work health and safety 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 work health and safety 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 work health and safety risk which needs be controlled.

7.2. Notifiable incidents

WHS Act sections 35-39

Incident notification

Immediately after becoming aware that a notifiable incident has occurred, you must ensure the regulator is notified. A notifiable incident includes the death of a person, or serious psychological or physical injury or illness that requires immediate treatment as an in-patient in a hospital. You must also ensure that records are kept for all notifiable incidents for at least five years.

Appendix A – Job characteristics, design and management

Psychosocial hazards that pose a risk to health and safety must be eliminated so far as is reasonably practicable, and the remaining risks must be minimised so far as is reasonably practicable in accordance with the hierarchy of controls.

Focusing on higher level control measures that address work design ensures the risk of harm is addressed at the source, rather than relying on measure that only reduce the impact of harm after it has occurred. In most cases, a combination of controls will be the most effective approach to eliminate or minimise psychosocial risk.

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
- poor environmental conditions

However, it is not an exhaustive list and you should use the process outlined in this code of practice 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.

High physical demands may include:

- Long, irregular or unpredictable work hours (e.g. doing shift work or being on call).
- 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 within the expected/available timeframe).

- Physically demanding, challenging or tiring work (e.g. undertaking hazardous manual tasks or strenuous physical tasks).
- Time pressures or fast paced work (e.g. unreasonable deadlines or computer/machine paced work).

High mental or cognitive demands may include:

- Allocating tasks to workers that are beyond the worker's capacity or competency (e.g. workers' lack the training, resources, skills, authority or experience to reasonably or successfully do tasks).
- 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).
- 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).
- Needing to quickly evaluate complex situations and make decisions under pressure.

High emotional demands may include:

- Responding to distressing or emotional situations (e.g. dealing with confrontation).
- Managing other people's emotions (e.g. de-escalating an aggressive situation or assisting people who are distressed).
- Providing support or empathy (e.g. conveying bad news, providing advocacy or counselling).
- Suppressing emotions or displaying false emotions (e.g. nursing staff hiding distress for patients or retail workers pretending friendliness with difficult customers).
- Performance management of underperforming workers, investigating misconduct or conducting disciplinary proceedings.
- Conflict between cultural expectations and job roles.

Low job demands may include:

- Having too little to do (e.g. running out of work) or long idle periods where workers cannot perform other tasks (e.g. where a worker must monitor a 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 significantly below a worker's skills or abilities.
- Idle periods when high workloads are present (e.g. having urgent work but being unable to proceed until equipment, resources or support become available).

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).
- 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).
- 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).

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

Modifying job demands

- Plan your workforce so you have an adequate number of appropriately skilled staff to do the work and so that tasks utilise your workers' skills.
- 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.
- 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).
- 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.
- 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.

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).
- Workers do not have control over their physical environment (e.g. working in uncomfortable temperatures).
- Insecure work arrangements (e.g. casual, gig, contract, labour-hire, on-call/rostering variations).

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.
- 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).

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.
- Monitor staff in 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.
- 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.
- 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 about what to do or how to do something (e.g. necessary information is not passed on or is communicated poorly).
- Not having the necessary tools, systems, equipment or resources to do their job properly or on time).
- 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).
- Infrequent or poor performance feedback and discussions (e.g. feedback is unclear, unhelpful or not provided).
- Frequent changes of supervisor and colleagues.

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.

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).

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).
- 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 (e.g. 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.
- Set clear work goals and clearly explain tasks.

Safe work systems and procedures

- Train workers on how to do their jobs and use relevant tools, equipment, systems, policies, or processes.
- Establish open communication (e.g. have an open-door policy) and encourage workers to share concerns early (e.g. by taking their concerns seriously and ensure they have safe spaces to raise them).
- Encourage and reward workers supporting each other.
- Encourage the development of positive working relationships (e.g. invest in team planning and building activities and encourage team discussions).

- Build interpersonal capabilities across the team (e.g. emotional intelligence, <mark>cross-cultural awareness</mark>, conflict resolution, or communication and feedback skills).
- Encourage supervisors to be empathetic in their leadership, including taking workers' concerns seriously, sensitively managing problems and helping when workers are struggling.
- Ensure supervisors understand their role in supervising workers.
- Encourage supervisors to provide timely, task specific, constructive feedback.

The worker

- Hire supervisors with the skills, experience and training to perform their role and support their team.
- 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.
- 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.

Physical work environment

- Provide a workplace which is compatible with workers' responsibilities (e.g. seat workers with their teams).
- 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 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).
- 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 organisations work more broadly.
- Encourage feedback on changes that affect workers' job tasks
- Design a performance feedback system where employees receive regular feedback and provide them an opportunity to raise concerns about role clarity.
- 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.
- 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 work health and safety 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, failure to communicate key messages).
- 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).
- 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 work health and safety 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 work health and safety concerns.
- Modify work plans to allow for a period of change (e.g. adjusting performance targets while workers learn new roles).
- 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).
- 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.
- 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.
- 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).
- 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).
- 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 processes (e.g. ensure performance measures relate to aspects of work within a worker's control and consult workers on performance expectations).

Providing appropriate recognition and reward

- Provide recognition or feedback promptly and ensure it is specific, practical, fair and clearly relates to workers' performance.
- 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.
- Train supervisors on how to have difficult conversations and manage underperformance in a way that prioritises improvement over blame.

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).
- 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).
- 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, work health and safety or workplace entitlement policies).
- Consult workers when setting work standards or performance expectations. Ensure they are achievable and workers will not be penalised for things outside their control.

Physical work environment

- Design a workplace environment where private conversations can be held and ensure confidential information is kept secure.

- Ensure the workplace accommodates reasonable needs of workers (e.g. provide accessible ramps, doors or IT equipment).

Safe work systems and procedures

- Provide mechanisms for workers to report issues, raise concerns or appeal workplace decisions.
- 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).
- 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.
- 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, animal welfare).
- 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, agricultural workers experiencing stock loss from drought or disease outbreak).
- 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).
- 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).

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).
- 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).
- 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').
- 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).
- Train supervisors on responding to trauma and where they can get assistance.

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).
- Provide employee assistance programs and encourage workers to use them.

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).
- 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 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 Code of Practice: *Managing the workplace environment and facilities* 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.

Poor physical environment

Exposure to unpleasant, poor quality or hazadous 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).
- 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).

You can find more information on physical hazards and the working environment on the Safe Work Australia website.

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 Safe Work Australia website.

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).
- **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
- 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:
  - high job demands
  - low job control
  - low support
  - organisational change, such as restructuring or significant technological change
  - lack of role clarity
  - 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
  - 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
  - inappropriate work scheduling, shift work and poorly designed rostering
  - unreasonable performance measures or timeframes
  - poor workplace relationships
  - poor communication
  - isolation
  - low levels of support
  - work group hostility

Harassment including sexual and gender-based 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
- 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 behaviour
- the presence of other psychosocial hazards (workers are more likely to be uncivil when they are stressed)

Controlling risks from harmful behaviours

Behaviours 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
- communication systems like phones, intercoms and alarm systems are in place, regularly maintained and tested
- 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)
- 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

Visibility

- Ensuring internal and external lighting provides good visibility, including in car parks
- Arranging furniture and partitions within the workplace to ensure good visibility of service areas, improve natural surveillance and avoid restrictive movement
- 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).
- 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

Safe work systems and procedures are administrative controls that should be part of your approach to managing risks at your workplace.

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)
- 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 *Guide for Transporting and Handling Cash* 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 screenshots 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
- 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
- train key workers (contact persons) to receive reports and give support and advice

Policies

- implement appropriate workplace policies as part of managing work health and safety 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
- 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.
- 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 a date.

Date: Click here to enter text.

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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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.