# CODE OF PRACTICE OCCUPATIONAL SAFETY AND HEALTH IN CALL CENTRES

c o m m i s s i o n for occupational safety and health

2005

#### Foreword

The introduction of the Occupational Safety and Health Act 1984 ('the Act') enabled the establishment of the tripartite Commission for Occupational Safety and Health. The Commission, which comprises representatives of employers, unions and government, as well as experts, has the function of developing the occupational safety and health legislation and supporting guidance material, and making recommendations to the Minister for their implementation. To fulfil its functions, the Commission is empowered to establish advisory committees, hold public inquiries, and publish and disseminate information.

This code of practice has been developed through a tripartite consultative process and the views of the employers and unions, along with those of government and experts, have been considered.

The Commission's objective is to promote comprehensive and practical preventive strategies that improve the working environment of Western Australians.

#### The Occupational Safety and Health Act 1984

The Act provides for the promotion, co-ordination, administration and enforcement of occupational safety and health in Western Australia.

The Act places certain duties on employers, employees, self-employed people, manufacturers, designers, importers and suppliers. It also places emphasis on the prevention of accidents and injury.

In addition to the broad duties established by the Act, the legislation is supported by a further tier of statute, commonly referred to as regulations, together with a lower tier of non-statutory codes of practice and guidance notes.

#### Regulations

Regulations have the effect of spelling out specific requirements of the legislation.

Regulations may prescribe minimum standards and have a general application, or they may define specific requirements related to a particular hazard or particular type of work. They may also allow the licensing or granting of approvals and certificates etc.

#### Codes of practice

A code of practice is defined in the Act as a document prepared for the purpose of providing:

- practical advice on preventive strategies; and
- a practical means of achieving any code, standard, rule, provision or specification relating to occupational safety and health in Western Australia.

A code of practice may contain explanatory information. The preventive strategies outlined do not represent the only acceptable means of achieving a certain standard.

A code of practice does not have the same legal force as a regulation and is not sufficient reason, of itself, for prosecution under the Act.

#### **Guidance notes**

A guidance note is an explanatory document providing detailed information on the requirements of legislation, regulations, standards, codes of practice or matters relating to occupational safety and health, as approved by the Commission.

This publication is available on request in other formats to assist people with special needs.

#### Authority

On 24 April 2005, the Hon Minister for Consumer and Employment Protection approved the Code of Practice: Occupational Safety and Health in Call Centres pursuant to Section 57 of the Occupational Safety and Health Act 1984.

#### Scope

This code of practice applies to all workplaces in Western Australia covered by the Occupational Safety and Health Act 1984. It provides guidance on occupational safety and health management in call centres. The practical guidance in this code of practice should be considered in conjunction with the general duties in the Occupational Safety and Health Act 1984.

## Who should use this code of practice?

This code of practice has been developed by the Commission for Occupational Safety and Health to assist employers, employees, people in control of workplaces and safety and health representatives to comply with the Occupational Safety and Health Act 1984 and the Occupational Safety and Health Regulations 1996.

## Copyright

The Western Australian legislation is reproduced by permission of the copyright owner, the State of Western Australia. However, these versions are not official or authorised versions. Official copies can be purchased from the State Law Publisher, 10 William Street, Perth [Tel. 08 9321 7688].

The Occupational Safety and Health Act 1984 and Occupational Safety and Health Regulations 1996 can also be purchased from WorkSafe, Westcentre, 1260 Hay Street, West Perth [Tel. 1300 307 877].

## CONTENTS

1.	INTR	ODUCTION	1		
2.	GEN	ERAL DUTIES AT THE WORKPLACE	2		
3.	HAZARD IDENTIFICATION, RISK ASSESSMENT AND RISK CONTROL — THE RISK MANAGEMENT PROCESS				
	3.1	An overview	4		
	3.2	Identifying hazards	4		
	3.3	Assessing and analysing risks	5		
	3.4	Controlling risks	7		
	3.5	Monitoring and review of control measures	8		
4.	INST	RUCTION AND TRAINING	9		
5.	WOR	WORKING ENVIRONMENT			
	5.1	Workspace	10		
	5.2	Electrical installations	11		
	5.3	Drinking water	11		
	5.4	Air quality and environmental tobacco smoke	11		
	5.5	Access and egress	12		
	5.6	Lighting	12		
	5.7	General facilities	13		
6.	WORKSTATIONS AND WORK ORGANISATION				
	6.1	Muscle and soft tissue injuries	14		
	6.2	Workstation design and setup	15		
	6.3	Work organisation	16		
	6.3.1	Work-related stress	19		
	6.3.2	Threatening behaviours	22		
7.	FATIO	5UE	24		
	7.1	General fatigue	24		
	7.2	Vocal fatigue	25		
	7.3	Visual fatigue and visual display units	26		
8.	ACO	JSTIC INCIDENTS AND NOISE CONTROL			
	8.1	Acoustic incidents	28		
	8.2	Noise control	31		
9.	ΗΟΤΙ	DESKING			
10.	HEAD	DSET HYGIENE			
11.	EME	RGENCY PROCEDURES			

CONTINUED OVER >

## CONTENTS CONT'D

APPENDIX 1:	OTHER SOURCES OF INFORMATION	35
APPENDIX 2:	LEGISLATIVE FRAMEWORK FOR OCCUPATIONAL SAFETY AND HEALTH IN WESTERN AUSTRALIA	37
APPENDIX 3:	ACTS AND REGULATIONS REFERENCED IN THIS CODE OF PRACTICE	39
APPENDIX 4:	POSITIONING OF EQUIPMENT	49
APPENDIX 5:	CHECKLIST OF SAFETY AND HEALTH ISSUES	52
SURVEY OF US	ERS OF THIS CODE OF PRACTICE	55

## 1. INTRODUCTION

The call centre industry is one of the fastest growing industries in Australia. Employees are usually casual workers and mostly women.

The aim of this code of practice is to help employers and employees address occupational safety and health issues related to call centre work. It recommends ways in which safety and health hazards commonly associated with call centre work can be addressed in accordance with the Occupational Safety and Health Act 1984 (referred to in this document as the Act), the Occupational Safety and Health Regulations 1996 (referred to in this document as the Regulations) and other relevant Commission for Occupational Safety and Health (referred to in this document as the Commission) codes of practice and standards.

The Act and the regulations should be read in conjunction with this code of practice.

## What is a call centre?

A 'call centre' is any workplace where the main work of employees is providing customer services by telephone or by a combination of telephone and computer.

The term usually refers to organisations that employ teams of people on shift work to provide or obtain information.

Call centre work may include:

- work where the primary role is to respond to telephone and other electronic requests such as emails from clients;
- work where employees are engaged to call up or answer large volumes of phone traffic or electronic requests;
- telemarketing work;
- help desk, contact centre or hotline work;
- switchboard operation;
- work from home; and
- workplaces that are part of a collective call centre service.

Often the call centre is not directly associated with the business for which the customer services are provided.

## Who are call centre employees?

In the context of this code of practice, the term 'employee' refers to employees whose main work is providing customer service through the use of a telephone or a combination of telephone and computer.

This definition includes employees whose workplaces are solely call centres, as well as employees who do call centre work within businesses. In many cases, a receptionist may do call centre work.

This code does not automatically include employees who work at a telephone and computer workstation, only those who are involved in specific call centre work.

This code of practice may also be useful for employees who do call centre work from home.

See Appendix 2 for further explanation on the legislation.

#### **GENERAL DUTIES AT THE WORKPLACE** 2

See Appendix 3 Section 19 of the Act

See Appendix 2 for an explanation of 'practicable'

The Act contains general duties (ie the general 'duty of care') that describe the responsibilities of people who affect safety and health at work.

#### Employers must, so far as practicable:

- provide a workplace and safe system of work so employees are not exposed to hazards;
- provide employees with information, instruction, training and supervision to enable them to work in a safe manner;
- consult and co-operate with safety and health representatives (if any) and other employees in matters related to safety and health at work;
- provide adequate protective clothing and equipment where hazards cannot be eliminated; and
- ensure plant can be used, cleaned, maintained, transported and disposed of safely.

### Safe systems of work: workplace policies and procedures

Policies and procedures should be developed and implemented for each workplace to ensure safe systems of work and include:

- hazard identification and risk assessment and risk control processes;
- monitoring performance and reviewing control measures;
- mechanisms for consulting with employees;
- induction and training programs;
- an agreed system for reporting and recording information on identified hazards or other relevant safety and health information;
- safe work methods, such as job or task procedures;
- ongoing inspection and maintenance programs;
- emergency evacuation procedures; and
- review of safety management policies and procedures.

#### Other people at the workplace

o — Tł	ne Act also sets out duties for other parties at the workplace:
•	employees must take reasonable care to ensure their own safety and health at work and the safety and health of others affected by their work;
•	self-employed people must take reasonable care to ensure their own safety and health at work and, as far as practicable, ensure their work does not affect the safety and health of others;
	contractors and people who engage contractors (principals) — where in the course of business or trade, a person (called 'the principal' in the Act) engages a contractor to carry out work, they have the responsibilities of an employer towards the contractor and his or her employees for matters over which they have control or the capacity to have control;
3 3 t	designers, manufacturers, importers and suppliers of plant must ensure that plant intended for use in a workplace is safe to install, maintain and use at workplaces. Safety and health information must be provided when plant and substances are supplied for use at work, and thereafter whenever requested for substances; and
	5• Th • • •

- and suppliers of plant must ensure that plant intended for use tain and use at workplaces. Safety and health information must be s are supplied for use at work, and thereafter whenever requested for
- designers and builders of a building or structure for use at a workplace must ensure, as far as practicable, that people constructing, maintaining, repairing, servicing or using the building or structure are not exposed to hazards.

See Annendix 3

### Consultation

Consultation and co-operation between employers and employees are the keys to providing and maintaining a safe and healthy workplace.

Employers are required to consult with safety and health representatives (if any) and employees on safety and health matters.

Employer and employee involvement in the process of identifying hazards and assessing and controlling the risks will help to ensure that:

- the risks from hazards are identified because employees are most likely to know about risks associated with their work;
- employees have a commitment to this process and any changes, such as implemented control measures; and
- injuries and incidents are eliminated or minimised.

Although the Act does not set formal means for consultation at the workplace, it does have provisions for safety and health representatives at the workplace.

These provisions in the Act address the functions and elections of safety and health representatives, employees' eligibility to be safety and health representatives, and the formation of workplace safety and health committees with employee and employer representatives.

## **Further information**

The Commission's Guidance note: Election of safety and health representatives, representatives and committees and resolution of issues, available on the internet at www.worksafe.wa.gov.au, and from WorkSafe.

The Commission's Guidance note: General duty of care in Western Australian workplaces, available on the internet at www.worksafe.wa.gov.au, and from WorkSafe.

See Appendix 3 Section 19(1)(c) of the Act

#### HAZARD IDENTIFICATION, RISK ASSESSMENT AND RISK 3. CONTROL — THE RISK MANAGEMENT PROCESS

#### 3.1 AN OVERVIEW

Employers have a duty to ensure, as far as practicable, that employees are not exposed to hazards at the workplace.

There is a specific requirement for employers to carry out a risk management process. It involves a three-step ee Appendix 3 process to:

- identify hazards;
- assess risks; and
- control risks.

To assist in carrying out the risk management process, consideration should be given to:

- previous injuries, 'near miss' incidents or accidents which have occurred at the workplace or other similar workplaces;
- relevant codes of practice and guidance notes;
- consultation with employees, safety and health representatives (if any) and safety and health committees to find out any problems associated with performing tasks or jobs;
- encouraging employees to report work-related injury or illness symptoms;
- walk-through inspections of the workplace. Consider using checklists; and
- records or statistics that could indicate potentially unsafe work practices.

#### 3.2 IDENTIFYING HAZARDS

The first step in the risk management process is identifying hazards. This involves recognising items that may cause injury or harm to the health of people.

There are a number of ways to identify items or potential situations that may cause an injury or harm. Choosing an appropriate process or procedure for identifying hazards will depend on the nature of the work environment and hazards involved.

Hazard identification processes or procedures may include:

- developing a hazard checklist;
- examining records of past incidents and injuries at the workplace; .
- examining data for similar workplaces;
- carrying out inspections of the workplace (consider using checklists);
- consulting relevant codes of practice and guidance notes;
- encouraging employees to report work-related symptoms;
- consulting employees and safety and health representatives and committees (if any); and
- talking to industry associations and other similar businesses.

A hazard identification process or procedure may range from simple checklists for specific equipment, such as workstations, to a more open-ended appraisal of a group of related work processes. Generally, a combination of methods will provide the most effective results.

#### Table 1 Common hazards at call centres

The safety and health hazards at call centres may include (but are not limited to):

- an inadequate physical working environment increasing the risk of injury or harm;
- inadequate workstations increasing the risk of muscle and soft tissue injuries;
- inadequate work organisation increasing the risk of muscle and soft tissue injuries, as well as work-related stress symptoms and fatigue including vocal and visual fatigue;
- acoustic incidents and background noise increasing the risk of an acoustic injury occurring; and
- inadequate headset hygiene increasing the risk of infection.

These hazards can be associated with overcrowding, poor workstation design, non-adjustment of workstations to suit the individual, repetitive work, work overload (such as when demand suddenly increases), insufficient 'time out', abusive customers, long spread of hours, faulty telephone equipment, hotdesking and sharing headsets.

## 3.3 ASSESSING AND ANALYSING RISKS

The second step in the risk management process is assessing the risks of injury or harm occurring. This involves looking at the chance or likelihood of a hazard occurring and, if it does occur, the extent of any harm or injury (ie the consequences).

This is a way of deciding which hazards need to be addressed first (ie where there is the highest risk of injury or harm).

This step should provide information on:

- where, which and how many employees are likely to be at risk of incurring injuries;
- how often this is likely to occur; and
- the potential severity of any injuries.

Risk assessment is not an absolute science — it is a 'best estimate' on the basis of available information. Therefore, it is important that the person undertaking a risk assessment has either the necessary information, knowledge and experience of the work environment and work process or such a person is involved in the risk assessment process.

In carrying out a risk assessment, it is necessary to break down each activity or process into a series of parts or smaller tasks and assess each one separately.

#### Table 2 Information for risk assessments

Ways to determine the likelihood and potential consequences of each hazard include:

- looking at other similar workplaces or similar processes;
- looking at the workplace's previous incident and injury reports and data for call centres;
- consulting with employees and safety and health representatives (if any);

Risk, in relation to any injury and harm, means the probability of that injury or harm occurring.

- looking at the way tasks and jobs are performed;
- looking at the way the work is organised;
- determining the size and layout of the workplace;
- assessing the physical environment;
- assessing the number and movement of all people at the workplace;
- determining the type of operation to be performed;
- identifying the type of equipment to be used;
- assessing adequacy of inspection and maintenance processes;
- examining the way all materials are handled;
- assessing what knowledge and training is needed to perform tasks safely and the adequacy of current knowledge and training (eg gap analysis);
- examining adequacy of procedures for all potential emergency situations; and
- looking at a possible inter-relationship of factors which might increase a risk.

## 3.4 CONTROLLING RISKS

The third step is to implement control measures to eliminate or reduce the risk of people being injured or harmed and ensure the measures are monitored and reviewed on an ongoing basis.

There is a preferred order of control measures ranging from the most effective to the least effective in eliminating or reducing the risks of injury or harm. This is outlined in the following table.

## Table 3 Preferred order of control measures to eliminate or reduce the risk of injury or harm 1. Elimination — removing the hazard or hazardous work practice from the workplace. For example: modifying workstation design; modifying work organisation with task analysis and job redesign; modifying work shifts; replacing faulty equipment; and preventing mobile phones being used inside the centre. 2. Substitution — substituting or replacing a hazard or hazardous work practice with a less hazardous one. For example, replacing equipment and workstations with better designed ones. 3. Isolation — isolating or separating the hazard or hazardous work practice from people involved in the work or people in the general work area. For example: locating fax machines in specifically designated areas away from employees; and ensuring noisy work areas, such as printers and photocopiers, are located away from employees. 4. Engineering controls — if the hazard cannot be eliminated, substituted or isolated, an engineering control is the next preferred measure. For example: repairing and maintaining equipment; promptly repairing network faults; installing acoustic shock prevention devices in telephone sets; reducing background noise levels; providing more space between operators/operator groups or installing acoustic barriers; and adjusting lighting to reduce glare. 5. Administrative controls — this includes introducing work practices that reduce the risk, such as implementing measures to ensure procedures, instruction and training are provided, for example: implementing acoustic incident reporting and action plans; implementing or improving customer contact and dispute resolution procedures; and

implementing job rotation.

In some instances, a combination of control measures may be appropriate.

#### Other means of reducing the risk

Other means of reducing the risk may be more appropriate to a particular case than the ones mentioned in this section and throughout the document, if they can eliminate or reduce the risk of injury or harm.

In all cases, the three basic steps of hazard identification, risk assessment and risk control must be carried out.

Least effective control measure

## 3.5 MONITORING AND REVIEW OF CONTROL MEASURES

Deciding on and implementing a risk control measure is not the end of the risk management process. It is important to constantly monitor and review control measures to ensure they continue to prevent or control exposure to hazards or hazardous work practices.

A risk management process should be conducted as an ongoing process because workplaces are usually constantly changing environments with new hazards being introduced; for example, when new equipment is introduced or the work environment or standards are changed.

In determining the frequency of the monitoring and review processes, consider such things as:

- the level of risk (high-risk hazards need more frequent assessments); and
- the type of work practice or plant involved (there may be particular stages in the life of a piece of equipment where more frequent assessments are appropriate).

Each workplace should:

- have a planned program of inspections and maintenance;
- undertake a review each time the work environment changes; and
- regularly review the process for hazard identification, risk assessment and risk control to ensure it is effective.

#### Maintenance of equipment

Maintenance and repair programs should be reviewed regularly to ensure their effectiveness. Performance testing and evaluation standards should be established.

Incorporating the manufacturer's recommendations, repair and maintenance programs should specify:

- where servicing is required;
- the extent of servicing required;
- the nature of the servicing required;
- the frequency of servicing;
- · who is responsible for maintaining repair and maintenance programs; and
- how defects will be corrected.

In order to keep accurate maintenance records, a recording or reporting system should be developed, implemented and maintained.

## 4. INSTRUCTION AND TRAINING

Employers must provide proper safety and health instruction and training to employees.

Instruction and training are an important part of ensuring safe systems of work and should take into account the functions of each employee and provide them with the necessary skills and knowledge to enable them to do their work safely.

The type of instruction and training given should include:

- general safety and health induction, including the 'duty of care' responsibilities under the Act and Regulations and workplace policies and procedures;
- task specific induction;
- 'on the job' training;
- 'in house' training programs designed to address specific needs (such as specific training for adjusting the workstation and hotdesking work); and
- industry-based or formal training (such as accredited or certificated courses).

#### Training programs

In developing and implementing an effective training program, employers should include:

- analysis of training needs, including the identification of the tasks to be performed and associated hazards and risks;
- identification of any pre-requisites or entry standards;
- definition of learning objectives and clear identification of the extent/level of competencies to be achieved (ie what will be covered in the training);
- selection of appropriate training aids depending on the environment and the targeted trainees (such as the use of hardware, graphics, videos and printed materials);
- adequate assessment (such as including a practical component where the trainee has to demonstrate applied skills);
- recognition of skills attained where applicable (such as accreditation or certification);
- · delivery of training by a competent person; and
- evaluation of the effectiveness of the training.

#### Induction

Induction programs are essential:

- for new employees;
- when work situations have changed; and
- when work practices are being introduced for the first time.

In addition to providing general safety and health information, an induction should include:

- 'on the job' training including, for example, how to carry out a job or task in a safe manner and not be exposed to injuries;
- information on the hazards and risks at the workplace; and
- emergency procedures.

## Further training

Employees may need further training when:

- new methods, equipment, hazards, policies or procedures are introduced;
- the type of operation or environment changes; or
- the particular requirements of a job change.

## 5. WORKING ENVIRONMENT

Providing workplace amenities is an integral part of the employer's general 'duty of care'.

Workplace amenities are the facilities provided for the welfare of employees while they are at work. They include (but are not limited to):

- workspace;
- drinking water;
- air quality and temperature controls;
- access and egress for all employees including those with a disability;
- lighting;
- wash basins;
- toilets;
- change rooms;
- dining facilities; and
- seating.

practice is available at www.worksafe. wa.gov.au and from WorkSafe

See Appendix 3 Regulations 3.6

and 3.14

This code of

There are minimum requirements for the provision of workplace amenities, which employers must meet. This section outlines some of these requirements. The Commission's Codes of practice: First aid facilities and services, workplace amenities and facilities, and personal protective clothing and equipment should be consulted for further information.

The Building Code of Australia (BCA) should also be consulted as it is recognised in Western Australia as the minimum regulatory standards to be met for buildings. It contains technical provisions for the design and construction of buildings, including structure, access, services and equipment, and some aspects of health and amenities.

## 5.1 WORKSPACE

The number of people working in a building and the way in which they are grouped must be considered and arranged to prevent risk to their safety and health.

Overcrowding can interfere with free movement of people, obstruct access to emergency exits, cause background noise and interrupt work performance.

People must be able to move freely to and from amenities or other work areas where they may be required, without strain or risk of collision.

The space required for any particular job should be based on a risk assessment that takes into account:

- the task;
- the physical actions needed to perform the task;
- the need to move around while working;
- access to and egress from the workstation and room to push the chair back; and
- the equipment and/or materials to be handled.

The space should allow for the full range of movements required to do each job. Employees should be able to move without strain or knocking against furniture or equipment.

Depending on the building type, a range of workstation configurations can assist in effective management of workspace in call centres, such as low-density workstation clusters with plenty of room between the clusters.

## 5.2 ELECTRICAL INSTALLATIONS

Safe electrical installations must be provided in call centres to minimise the risk of electrical shock or fire.

In addition:

- portable electrical equipment must be protected against earth leakage current by a residual current device (RCD);
- people having control of the workplace are required to install non-portable type RCDs either by installing them at the switchboard or in a fixed socket outlet.

Where non-portable RCDs are fitted to a switchboard, the work should be carried out by an electrician; and

 cords should be placed away from walkways and foot contact to prevent mechanical damage and slips and trips.

## **Further information**

- Safety priorities for electricity in the workplace, available on the internet at www.worksafe.wa.gov.au
- WorkSafe smart move: General module: Electricity, available on the internet at www.worksafe.wa.gov.au
- the Commission's Guidance note: Electricity: Residual current devices, available on the internet at www.worksafe.wa.gov.au

## 5.3 DRINKING WATER

An adequate supply of clean drinking water must be provided and be readily accessible to employees. Its temperature should be below 24 degrees.

## 5.4 AIR QUALITY AND ENVIRONMENTAL TOBACCO SMOKE

Employers must ensure employees are not exposed to an oxygen-deficient or toxic atmosphere.

Adequate ventilation, through air-conditioning systems or natural ventilation, should be provided to ensure:

- the air conditioning or air exchange is adequate for the number of employees; and
- fumes and foreign odours, from a range of sources such as new furniture and fittings and perfumes, are removed.

Thermal comfort, with temperature and humidity control, must be provided to enable employees to work in a comfortable environment.

Smoking is prohibited in enclosed workplaces, including call centres.

## **Further information**

- The Commission's Codes of practice: First aid facilities and services, workplace amenities and facilities, personal protective clothing and equipment contains further information on air quality, air temperature and the provision of air conditioning systems and natural ventilation. It is available on the internet at www.worksafe.wa.gov.au and from WorkSafe.
- The National Occupational Health and Safety Commission's, Guidance note on the elimination of environmental tobacco smoke in the workplace [NOHSC: 3019(2003)]. This has been adopted by the Commission as a Western Australian guidance note, subject to a modification to Section 7. It is available on the internet at www.worksafe.wa.gov.au

See Appendix 3

Regulations 3.37, 3.38 and 3.39

See Appendix 3

Regulations 3.15, 3.44A, 3.44B

and 3.44C

## 5.5 ACCESS AND EGRESS

The employer or person having control of access to the workplace must ensure, where practicable, that:

the means of access to and egress from the workplace enable people to move safely to and from the workplace and are kept free of obstructions; and

the emergency exits enable safe exit in emergencies.

In addition to these minimum requirements set by the Regulations, the Building Code of Australia (BCA) also sets regulatory building standards to be met for exits (in 'D1 Provision for Escape'), including the maximum travel distance to exits.

Employers should also ensure secure night access to and from the workplace for shift workers. This may include providing adequate lighting, building security and parking, where appropriate.

#### 5.6 LIGHTING

Employees must be provided with lighting appropriate for the nature of the work and the work location.

The lighting should allow employees to carry out their work effectively and move safely without risk of accident or injury.

Poor lighting may lead to employees adopting awkward positions at the workstation increasing the risk of muscle and soft tissue injuries; for example, if there are difficulties in reading the screens, employees might be continually leaning forward to read them.

Factors to consider when providing lighting include:

- the nature of the work activity;
- the work environment;
- illumination levels (both natural and artificial light);
- glare;
- contrast; and
- reflections.

#### **Control measures**

Possible control measures to implement include:

- providing lighting appropriate for the nature of the work and the work location;
- ensuring lighting is bright enough for employees to read guidance material during calls, but soft enough to not cause eye strain from shadows or glare on computer screens; and
- fitting windows with blinds and positioning internal lighting to minimise screen glare or reflections, where necessary.

See also Section

7.3 Visual fatigue

and VDUs

See Appendix 3

Regulations 3.7 and 3.8

See also Appendix 4 Positioning of equipment

### Screen-based workstations

The lighting in the vicinity of screen-based workstations should be designed and maintained in accordance with Australian Standard, AS 1680.2.2 Interior lighting — Office and screen-based tasks.

Of the various factors that affect the quality of lighting in a screen-based environment, the illuminance can be readily checked against the values set out in the following table.

#### Table 4 Minimum illuminance (lux) (supply of lighting) for screen-based work

Task area		Illuminance (lux)*		
Keyboard		160-240		
Reference material: (a) Go	ood, simple	240		
(b) Av	erage, detail	320		
(c) Po	or, fine detail	600		See als
Background/environment		160	-	Visual

\*The illuminance produced by light fittings decreases with age. This is due to ageing of the lamps, as well as build up of dirt on the light fittings and reflective surfaces etc. For this reason, the lighting levels recommended are the levels below which the lamps and optical surfaces of the lighting unit should be serviced.

Note: This table is based on information in the Australian Standard, AS 1680.2.2 Interior lighting — Office and screen-based tasks. Permission to reprint the information has been provided by SAI Global Ltd. The standard can be purchased online at www.sai-global.com or by writing to Customer Service Centre, SAI Global Ltd., 286 Sussex Street, Sydney, NSW 2000.

Note that factors additional to illuminance levels, such as the colour rendering of the lamps used, the contrast ratio between adjacent illuminated surfaces and excessive glare, can also significantly affect the user's comfort.

## **Further information**

- The Building Code of Australia (BCA) should be referred to for the regulatory requirements for lighting within buildings. For more details refer to the internet site at www.abcb.gov.au
- Information on lighting is also available at www.worksafe.wa.gov.au

## 5.7 GENERAL FACILITIES

Employers must ensure that all employees have access to toilet facilities and wash basins and they are readily accessible.

Comfortable meal and 'break out' (time out) areas should be provided with sufficient seating and tables.

## **Further information**

The Commission's Codes of practice: First aid facilities and services, workplace amenities and facilities, personal protective clothing and equipment contains further information on workplace facilities. It is available on the internet at www.worksafe.wa.gov.au and from WorkSafe.

13

on 7.3 l fatigue

## 6. WORKSTATIONS AND WORK ORGANISATION

## 6.1 MUSCLE AND SOFT TISSUE INJURIES

Call centre employees may be at risk of developing musculoskeletal disorders, such as soft tissue injuries to the neck, shoulders, back, wrists and hands.

These disorders are commonly grouped under the term 'occupational overuse syndrome' (OOS) and arise from work that involves maintenance of constrained, static or awkward postures and/or repetitive and/or forceful movements. Further explanation on OOS is provided in the National code of practice for the prevention of occupational overuse syndrome [NOHSC: 2013(1994)].

Work is considered repetitive when, for example:

- the completion of a task takes less than 30 seconds and the task is performed continuously for a minimum of 60 minutes; and/or
- a main part of a work task is repeated for more than 50 per cent of the time it takes to complete the whole task; for example, when an employee enters data during a phone call, the data entry activity is performed for more than 50 per cent of the time taken to complete the whole task.

The duration of a task can have a substantial effect on the likelihood of both muscle strain and fatigue. 'Duration' means the length of time a worker takes to complete a task.

Where highly repetitive work is performed for a total of four hours during an eight-hour shift, it is considered of high duration and should be subject to specific control measures. These are listed in Section 6.3.

Table 5 Identify and assess occupational overuse syndrome (OOS)			
Identify OOS hazards by:	Assess OOS risk factors by:		
<ul> <li>identifying factors which lead to muscle tension, increasing the risk of injuries;</li> <li>consulting employees when identifying factors and developing priorities for assessment;</li> <li>encouraging employees to report repetitive,</li> </ul>	<ul> <li>checking the workstation layouts;</li> <li>checking the working postures;</li> <li>examining the duration and frequency of activities;</li> <li>examining the forces applied;</li> </ul>		
<ul> <li>uncomfortable or static tasks;</li> <li>encouraging employees to report work-related muscular strain symptoms;</li> </ul>	<ul> <li>reviewing the work organisation;</li> <li>reviewing employees' skills and experiences;</li> <li>reviewing individual factors particular to the tasks.</li> </ul>		
checking injury and absentee records; and direct observation.	<ul> <li>reviewing individual factors particular to the tasks and/or workplace; and</li> <li>consulting with employees when developing risk assessment methods.</li> </ul>		

This code of practice is an approved Western Australian code of practice under the Act. It is available at www.nohsc. gov.au

## 6.2 WORKSTATION DESIGN AND SETUP

Well-planned design and layout of the workstation, displays and control instruments will make work easier and reduce the risk of postural and visual strain arising from adoption of awkward postures.

The shape and adjustability of a workstation influences the postures adopted. Additionally, the location and type of equipment used at the workstation influences the range of movements performed.

The design and setup of a workstation should be directed by the range of employees who use it, the tasks they perform, and the type of equipment to be accommodated.

#### **Control measures**

Possible control measures to implement include:

reviewing workstation and equipment design (including displays and controls);

Workstation design should be aimed at providing comfortable and varied working postures, particularly where there is a need to repeat the task continuously or to maintain fixed postures for long periods.

#### Table 6 Workstation design

- As a general rule, work activities, equipment, controls, work items, documents and materials, which are most important, most frequently used or require rapid hand movements, should be in front of the employee and within easy reach to minimise stretching and twisting.
- Workstation equipment, such as furniture and keyboards, should be adjustable to suit the full range of physical characteristics of individual employees. Employees must be able to adopt a safe working posture.
- Displays and control instruments should have appropriate design, selection, arrangement and labelling so that employees are able to operate equipment safely and maintain correct posture.
- Displays should be placed where they can be easily seen.
- Poor lighting should be corrected, as it may lead to employees adopting awkward positions at the workstation, increasing the risk of muscle and soft tissue injuries. For example, if there are difficulties reading the screens, employees might be continually leaning forward.
- Sufficient surface area on the workstation for equipment and documents should be provided.
- providing adjustable workstations;

Workstations (desk, chair and, where required, a footstool) should be adjustable to suit the task demands, the body dimensions and personal needs and, where hotdesking and shiftwork is carried out, allow for use by different employees.

In most instances, a fixed height desk plus an adjustable chair and a footstool should be acceptable. However, in some situations (such as when the employee works from different points along the workstation) an adjustable or partially adjustable height desk may be necessary.

ensuring employees adjust the workstation and equipment before starting work;

The risk of muscular injuries may increase if employees cannot or do not adjust workstation equipment to suit the task demands and their body dimensions and personal needs before starting work. With hotdesking, employees may simply forget to adjust furniture after a move because of work pressure, lack of training and information, or if they are distracted.

Adequate time must be provided so employees can make adjustments to the furniture before starting work.

Adequate information, instruction and training on adjusting workstations must also be provided to ensure employees know how to adjust furniture and do so before starting work.

See also

Appendix 4

Positioning of equipment Additional means of implementing this control measure include:

- providing adequate supervision;
- for hotdesking, allowing adequate time to set up workstation and make adjustments before starting work; and
- providing screen prompts on adjusting workstation for employees starting a work shift.
- encouraging employees to vary activities and postures, rather than remaining in a prolonged static position at the workstation;

For example, a tray containing new work could be placed on a table away from the workstation so an employee must walk to get the work.

taking into account individual factors when designing work for an individual employee; and

Employees will have different body shapes and sizes, as well as different capabilities, preferences and disabilities. As far as practicable, employers should provide workstations, work tasks and work conditions that are most suited to an employee's physical capabilities.

ongoing review and maintenance of equipment.

Checks of equipment, including computers, furniture, displays and controls, should be carried out regularly to ensure employees are not working in unsafe situations due to faulty equipment.

Employees should be encouraged to report faulty equipment so they can be replaced or repaired.

#### **Further information**

- National code of practice for the prevention of occupational overuse syndrome [NOHSC: 2013(1994)], available on the internet at www.nohsc.gov.au. This is an approved code of practice under the Act.
- Ergonomic principles and checklists for the selection of office furniture and equipment (1991), available on the internet at www.nohsc.gov.au
- Appendix 4 Positioning of equipment at the back of this code.

#### 6.3 WORK ORGANISATION

If work is organised in such a way that there are long work periods doing uncomfortable or repetitive work without breaks then the risk of employees developing muscle and soft tissue injuries may increase.

 Modifying tasks should be considered as a preventative measure to eliminate or reduce the risk of employees developing these injuries, as well as changing or reducing possible causes of work-related stress.

Job design should include variety and flexibility, where possible, to promote job satisfaction and motivation and increase morale. Symptoms of stress may arise if employees experience little scope for control of the work and monotonous and/or demanding work.

The aim of effective work organisation is to take into account all the factors that affect the work and to design and arrange work content and tasks so the whole job is without likely risk to the safety or health of employees.

Work organisation risk factors can include:

- unrealistic targets;
- excessive performance monitoring and monetary incentives for increased output, such as bonus and piece rate systems;
- meeting tight deadlines and peak demands, which can increase time pressures;
- lack of control over workflow;
- infrequent or insufficient 'time out' breaks;
- hotdesking work; and
- an inadequate time period to adjust to the job.

#### Table 7 Reviewing the way the work is organised

#### Consider:

- the required output and/or the urgency of deadlines;
- the duration and limited variation of tasks;
- the combination of repetitive tasks which involve the same movements; and
- the number and duration of work breaks.

#### **Control measures**

Possible control measures to implement include:

- designing jobs to include, where possible, variation and flexibility;
  - Design jobs to include, for example:
  - work variation, rotation and/or duties not involving telephone use;
  - tasks that require a wider range of body movements when programs involve limited repetitive hand and arm movements;
  - some flexibility in place of set telephone scripts; and
  - regular breaks for 'time out' with the flexibility to take breaks, including toilet breaks, as required.

Job design should aim at not allocating similar tasks consecutively.

- where practicable, organisation of the work so employees are able to regulate their tasks to meet work demands;
- providing adequate information, instruction, training (including job-specific training) and supervision;
  - Information, instruction, training and supervision must be provided to ensure the risks from OOS are eliminated or reduced.

Training should be job-specific. In particular, it should address how the employee should organise the work, including the appropriate pauses and 'timeout' periods to be taken. Short, frequent breaks are better than longer, less frequent breaks.

providing user-friendly software;

For example, providing software that requires fewer key strokes or mouse movements to perform actions to minimise static and repetitive movements.

 providing adequate rest breaks for purposes of changing posture and taking breaks from repetitive keying and voice use;

#### Table 8 Breaks from repetitive work

Ensure operators take breaks from frequent keying. These should be taken every hour. The arrangement can be flexible; for example, the options\* for breaks could be as follows:

- two-three minutes in each 15-20 minutes;
- five minutes in each 30 minutes; or
- 10 minutes in each hour.

Other alternatives, suitable to the workplace, should be developed in consultation with staff.

Non-repetitive work could be performed during these breaks, although it should not involve frequent or rapid movements of the hands or fingers.

\*This information is based on recommendations in the WorkSafe document, Safetyline essentials: Manual handling — Occupational overuse syndrome keyboard operators: Reducing the risk (available at www.worksafe.wa.gov.au), which contains additional recommendations for keyboard work.

- encouraging the early reporting of any symptoms of OOS;
- initiating work assessment and reorganising tasks when an operator reports symptoms of OOS;
- providing screen prompts on safe work practices;
- providing a suitable period of adjustment;

For example, before allocating a full workload of keyboard duties, allowing an adjustment period for employees new to keyboard work or returning from extended absences.

developing specific policies and procedures for shift work; and

Issues that may arise from shift work and contribute to work-related stress include fatigue, domestic and social difficulties and personal safety.

Means of implementing this control measure include:

- training both management and staff to identify and manage the common health effects from shift work;
- providing some flexibility in working arrangements so staff are able to deal with temporary domestic and social difficulties;
- consultation between staff and supervisors when changing rosters;
- designing night shift tasks to include, where possible, activity, interaction with other employees and breaks to help maintain alertness; and
- providing reasonable advance notice of shift rosters.
- developing clear policies on performance monitoring.

Performance targets and performance monitoring can raise stress levels if aimed at increasing output without considering the capacity of employees and the adequacy and safety of the call centre system.

Targets should be set in consultation with employees and safety and health representatives (if any), taking into consideration workplace changes and demands. Ideally, targets should focus on quality rather than quantity-based goals, such as aiming to improve customer relations and reducing the potential for complaints.

See also Section 7 Fatigue

## Electronic performance monitoring (EPM)

EPM records the minute-by-minute details of work activities or 'listens-in' on client calls and is used both as a training tool and for performance assessment.

Where EPM is used:

- consultation should occur between employer and employees about the system of monitoring to be used;
- supervisors who are listening in should be seated next to or near the employee and providing verbal feedback;
- supervisors should also provide constructive recognition of good performance and regular feedback on each operator's performance;
- employees should be provided with training if they are not meeting targets; and
- supervisors and employers should communicate what the outcome will be if targets are not met.

## **Further information**

National code of practice for the prevention of occupational overuse syndrome [NOHSC: 2013(1994)]. This is an approved code of practice under the Act.

## 6.3.1 WORK-RELATED STRESS

'Work-related stress is experienced when the demands of the work environment exceed the employee's ability to cope with (or control) them.

Stress is not a disease, but if it is intense and goes on for some time, it can lead to mental and physical ill-health. Being under pressure can improve performance and give satisfaction when challenging objectives are achieved. But when demand and pressure become too much, they lead to stress. And this is bad for workers and for their organisations.<sup>1</sup>

In call centres, workplace issues, such as unreasonable performance demands (for example, pressure to increase the rate of successful calls), lack of training, excessive or inappropriate monitoring, repetitive or monotonous work, aggressive clients and bullying, are reportedly factors contributing to symptoms of stress.

People respond to pressures and demands differently. What is stressful for one person may not be a problem for someone else. The effects of work-related stress will also vary.

Some effects may have long-term implications for psychological and physical health and well-being, such as headaches, sleep disorders, chronic fatigue and psychological problems (for example, poor concentration, suppressed anger, anxiety, depression, dependencies, error-proneness and apathy). Stress can also be a factor in other conditions such as OOS and acoustic shock.

Even though a person's overall stress condition may be explained by both work and non-work factors, it is recommended that the focus at the workplace be on implementing preventative measures.

#### Preventative measures

Rather than explaining stress with simple 'cause-and-effect' factors, it can be explained as a combination of three factors: stressors (the origins of stress), a person's 'makeup' and an effect, as the following diagram illustrates.



The preventative measures should address these three factors and include, for example:

designing jobs to eliminate or reduce the stressors where possible;

Symptoms of stress may arise from experiencing little scope for control and monotonous and/or demanding work.

Modifying tasks should be considered as a preventative measure to change or reduce possible causes of work-related stress.

Job design should aim to:

- provide variation and flexibility, where possible, to promote job satisfaction and motivation and increase morale. Refer to Section 6.3 for more information on work organisation;
- ensure hotdesking is managed safely. Refer to Section 9 for more information; and
- include specific policies and procedures for shift work. Refer to Section 7 Fatigue for more information.
- providing training in job and stress management skills to enable employees to deal with performance demands; and

Training in job and stress management skills should enable employees to develop the skills and knowledge to better deal with situations encountered and enable recovery from demanding ones.

As a preventative measure for stress management, the aim of training should be to improve the ability to:

- clearly communicate to clients;
- deal with difficult client behaviour;
- defuse and manage situations where there is potential for difficulties; and
- deal with clients' behaviour when changes in business policy cause negative reactions.

• providing a supportive management and work environment.

Work that includes excessive close monitoring and unreasonable performance demands may contribute to low job satisfaction and work-related stress.

Fostering a supportive work environment and team spirit may help promote job satisfaction.

Consider the following control measures as possible measures to implement to improve the work environment:

developing customer contact procedures;

Procedures should be developed in consultation with employees and safety and health representatives (if any) and include procedures for:

- call transfer;
- dealing with difficult customers (refer also to the following section on threatening behaviours);
- reporting of any issues that arise;
- where appropriate, adequate 'timeout' periods when contact with difficult customers causes tension and/or distress;
- debriefing sessions following difficult calls; and
- follow-up by supervisory staff on any issues arising.
- consultation with employees;
  - Consultation between employer and employees and safety and health representatives (if any) must take place to develop and implement safe work procedures. This may include providing:
  - opportunities for all employees to participate in the development of workplace policy and procedures;
  - clear definition of duties;
  - adequate opportunities for employees to provide feedback on workplace issues; and
  - conflict resolution procedures in which grievances and conflict are treated seriously, objectively and promptly.
- setting realistic and attainable performance measurement targets;
  - For further information, refer to Section 6.3.
- developing clear policies on performance monitoring; and
  - For further information, refer to Section 6.3.
- addressing working environment issues.
  - In relation to work-related stress, working environment issues to address include:
  - ensuring workplace amenities are adequate; and
  - addressing security issues particularly for the safety of shift workers who arrive or leave the workplace outside of standard business hours.

### **Further information**

- Sprigg, Christine A., Smith, Phoebe R., Jackson, Paul R. (2003). Psychosocial risk factors in call centres: An
  evaluation of work design and well-being. Health and Safety Executive Research Report 169, available on the
  internet at www.hse.gov.uk
- · Information on work-related stress is also available on the internet at www.worksafe.wa.gov.au

## 6.3.2 THREATENING BEHAVIOURS

The employer's general 'duty of care' to provide and maintain a working environment where employees are not exposed to hazards applies to the risks of injury or harm from workplace violence and bullying in the same way it applies to other hazards.

Behaviour hazards may include:

- workplace violence (ie an action or incident that physically or psychologically harms another person);
- the threat of injury or harm through physical attack;
- harassment from co-workers, supervisors, customers or outsiders. Harassment may be sexual, racial, religious, political, abusive or involve bullying; and
- bullying from co-workers, customers or outsiders, either at the workplace or when arriving or leaving it.
   Workplace bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more people against another or others at the place of work and/or in the course of employment, which could reasonably be regarded as undermining an employee's right to dignity at work.

Employers must implement measures to ensure the protection and security of workers against physical or psychological injury or harm from violent, threatening and abusive behaviours.

#### **Control measures**

Possible control measures to implement include:

developing a policy and procedure for the prevention and management of violence and bullying;

These should address incidents of harassment, physical violence, threatening behaviour and bullying and include:

- procedures for identifying security hazards and assessing and controlling the risks; and
- procedures for reporting and follow-up of incidents.
- providing information and training to all employees on the above policy and procedures;

Information and training should identify unacceptable bullying behaviours and appropriate behaviour at the workplace.

- providing adequate supervision;
- providing 'break out' ('time out') facilities;
- involving the Western Australia Police Service where physical harm or, in some cases, threat of physical harm occurs; and
- addressing the safety of those working outside standard business hours.

This should include:

- providing safe lighting for workers arriving and departing at night;
- providing safe access to toilet and washroom amenities;
- providing safe parking arrangements, where practicable. This could include installing secure perimeters around the car park;
- instructing staff to park close to building exits and leave in pairs; and
- where necessary, providing security escorts for those leaving the workplace.

## Further information

- The Commission's Code of practice: Workplace violence, available on the internet at www.worksafe.wa.gov.au and from WorkSafe.
- The Commission's guidance notes, Dealing with workplace bullying: A guide for employers and Dealing with workplace bullying: A guide for employees, available on the internet at www.worksafe.wa.gov.au and from WorkSafe.

## 7. FATIGUE

## 7.1 GENERAL FATIGUE

'Fatigue' is a general term used to describe the feeling of being tired, drained or exhausted. It is accompanied by poor judgment, slower reactions to events and decreased skills.

Fatigue can result from long or arduous work, little or poor sleep and the time of day when work is performed. It can be influenced by health and emotional issues, or by several of factors in combination, and can accumulate over a period of time.

Table 9 Fatigue factors	
Main factors causing fatigue	Examples
Body clock factors	Working during normal sleep times and sleeping when normally awake and consequently getting less than normal or poor quality sleep.
Work factors	Excessive work schedules and/or working very long hours with insufficient time to recover from work and/ or broken or split shifts.
Lifestyle factors	Inadequate sleep due to social events.
Medical factors	Medical sleep problems.

Further information on these factors is available in the Commission's Guidance note: Reducing the risk of fatigue at workplaces, available on the internet at www.worksafe.wa.gov.au and from WorkSafe.

Where fatigue may affect an employee's ability to work safely, it must be identified, assessed and controlled like other risks at the workplace.

It is important to address fatigue as a safety and health issue in call centres where employees work night shifts, very long hours or broken or split shifts.

As fatigue impairs an employee's judgment of their state of fatigue, effective management of it should not be the responsibility of the employee alone. Both employers and employees have a role to play in making sure any risks associated with fatigue are minimised.

An employer may identify fatigue by the following fatigue indicators:

- increased employee irritability;
- increased errors by the employee;
- employees falling asleep at work; and
- increased employee absenteeism.

Open communication between employers and employees is necessary to help identify fatigue at the workplace.

### **Control measures**

Each workplace is unique and employers should identify fatigue management strategies appropriate for the particular workplace.

Possible control measures to implement include:

revising the rosters;

For example:

- designing work schedules to provide for sufficient good quality sleep. The most beneficial sleep is a
  good night's sleep of at least six hours, taken in a single continuous period. The restorative effects are
  less if the sleep is split between day and night time; and
- considering allocating more than one day off in seven when night work exceeds two consecutive shifts between 10.00 p.m. and 8.00 a.m.
- giving at least 24 hours' notice before night work;
- allowing regular night workers periods of normal night sleep so they can catch up on their sleep debt;
- minimising irregular or unfamiliar work rosters;
- minimising night work when employees return from leave or an extended period away to allow them time to adapt; and
- considering alternatives to night shifts.

#### **Further information**

- The Commission's Guidance note: Reducing the risk of fatigue at workplaces, available on the internet at www.worksafe.wa.gov.au and from WorkSafe.
- The Safetyline guide, Safety and health in shiftwork, available on the internet at www.worksafe.wa.gov.au

## 7.2 VOCAL FATIGUE

Call centre employees spend more of their working day speaking on the phone than most office employees and are at greater risk of developing throat and voice fatigue symptoms.

These problems, medically described as 'dysphonia', can include pain, tension, croakiness, an irritating cough, an inability to modulate, poor or no vocal power and breathing difficulties.

Call centre employees must be given information on identifying the symptoms and controlling the risk of dysphonia.

Good voice health practices, developed in consultation with employees and their safety and health representatives (if any), can reduce voice overuse problems.

## **Control measures**

Possible control measures to implement include:

- shortening opening greeting scripts and giving employees frequent micro-breaks while callers respond to questions;
- providing information and training;

Examples of information and training include:

- providing training on voice production, such as a session with a speech pathologist for training on exercises to develop and protect the voice; and
- encouraging employees to stretch the neck and shoulders to relieve tension. These exercises can be done at workstations as well as during breaks, and could be initiated by regular prompts on employees' screens.
- providing adequate rest breaks;
- reducing background noises;

For information on noise control, refer to Section 8.2.

 ensuring the air temperature is not too warm and the level of humidity is not too low (ie the air is not too dry);

Dry air can affect the voice quality and hot temperatures can dry the vocal folds, laryngeal and nasal membranes, potentially increasing the risk of irritation, dehydration and vocal fatigue.

- encouraging employees to drink water to ensure their throats are sufficiently lubricated; and
- assigning non-speaking tasks when employees identify dysphonia symptoms or have severe common colds, which can increase the risk of dysphonia.

## 7.3 VISUAL FATIGUE AND VISUAL DISPLAY UNITS

An inadequate working environment and workstation can contribute to the risk of employees developing visual fatigue.

The symptoms of visual fatigue include sore eyes, blurred vision, tired eyes and headaches.

Although intensive use of Visual Display Units (VDUs) can cause temporary vision fatigue, there is no convincing scientific evidence of long-term eye damage.

#### **Bifocal glasses**

In general, where an employee wears bifocal glasses, graduated lenses are recommended so there is the ability to change from short to mid to long distance vision. However, each person should obtain advice from an appropriate specialist on suitable lenses for use at the workplace.

#### **Control measures**

To minimise eye and muscle strain and increase general comfort, possible control measures to implement include:

- installing adjustable screens, keyboards, desktops, document holders, footrests, chairs and headsets;
- installing high resolution VDU monitors and larger screens;
- installing adjustable overhead lighting;
- installing software easy to understand and operate;
- keeping screens free from glare and reflections by controlling the ambient light conditions;
- reducing the dust in the environment; and

• providing adequate instruction, training and supervision.

For example, ensure employees:

- adjust the monitor brightness and contrast settings;
- keep the screen clean from dust and smears;
- correctly position reference material;
- consider appropriate font, font size and colours;
- exercise and stretch the eye muscles occasionally, such as relaxing the eye muscles occasionally by looking away from the screen and focusing on an object as far away as possible; and
- take regular breaks and/or do other tasks away from the VDU.

Consideration could be given to training employees to know when to consult an optometrist for testing of vision.

## 8. ACOUSTIC INCIDENTS AND NOISE CONTROL

## 8.1 ACOUSTIC INCIDENTS

Acoustic incidents are sudden, unexpected loud noises occurring through a receiver during telephone or headset use. They may be crackles, hisses, whistles or shrieks or high-pitched noises.

Although many acoustic incidents occur in call centres throughout Australia, only a very small proportion cause the symptoms known as 'acoustic shock' in employees who have experienced them.

The noises can come from a wide variety of sources, either within the transmission system or from the customer end.

Table 10 Sources of acoustic incidents	
Within the transmission system, from:	From the customer end, from:
<ul> <li>faulty or damaged networks, telephones and headset equipment;</li> </ul>	- feedback oscillation from some cordless phones;
- broadband and narrowband interference; and	- alarm signals;
- mobile phones or fax machines used in call centres.	- signalling tones;
	- phone receivers slammed down or dropped;
	<ul> <li>tones from misdirected facsimiles and modems; and</li> </ul>
	<ul> <li>noises made close to the receiver, such as people whistling and babies screaming.</li> </ul>

High background noise levels at the workplace can increase the risk of acoustic shock occurring from an acoustic incident, as operators may raise the volume in their headsets to improve hearing, increasing the impact of any sudden, loud telephone noise.

When an acoustic incident occurs, the operator's automatic reaction is to remove the headset or receiver as quickly as possible and, in some cases, this may help prevent or reduce the effects of acoustic shock.

#### Acoustic shock

'Acoustic shock' is a term used to describe the symptoms a person may experience from an acoustic incident. It is not caused by the loudness of a telephone noise, as all phone noise is electronically limited to a peak noise level of 123 decibels, but by a sudden rise in noise levels.

Other factors, such as a middle ear inflammation and feelings of tension, may increase the likelihood of an acoustic shock resulting from an acoustic incident.

Some researchers believe that the combination of feelings of tension and sudden loud noise causes excessive contraction of the middle ear muscles, triggering the symptoms known as acoustic shock.

#### Acoustic shock symptoms

The effect on individuals can vary greatly for the same increase in sound level. Only a small number of people develop symptoms from an acoustic incident. Why a person experiences symptoms after an acoustic incident is not known with certainty and is still being researched.

One possible explanation<sup>3</sup> is that a loud noise produces a 'startle reflex' in one of the middle ear muscles and that the sound threshold of this reflex is lowered when the person is feeling tense or distressed. Under this explanation, it is likely that acoustic shock is not due to one single factor, such as the level of sound experienced, but to a combination of physical and psychological factors. While there is no confirmed evidence of tissue damage or long term hearing loss resulting from an acoustic incident alone, some people who have been exposed to an acoustic incident have reported one or more of the symptoms listed below.

## Table 11 Acoustic shock symptoms

Audiologists have grouped symptoms into three categories:

1. Primary (immediate) symptoms, which include but are not limited to:	<ul> <li>a feeling of fullness in the ear;</li> <li>burning sensations or sharp pain around or in the ear;</li> <li>numbness, tingling or soreness down the side of face, neck or shoulder;</li> <li>nausea or vomiting;</li> <li>dizziness; and</li> <li>tinnitus and other head noises such as eardrum fluttering.</li> <li>In a very few cases, there may be hearing loss. In extremely rare cases, there may be a fall to the ground.</li> </ul>
Later symptoms:	
2. Secondary symptoms, which include but are not limited to:	<ul> <li>headaches;</li> <li>fatigue;</li> <li>a feeling of being off-balance; and</li> <li>anxiety.</li> </ul>
3. Tertiary symptoms, which include but are not limited to:	<ul> <li>hypersensitivity ie a sensitivity to previously tolerated sounds such as loud voices, television and radio; and</li> <li>hyper vigilance ie being overly alert.</li> </ul>

People experiencing such symptoms will respond in different ways. As with other workplace injuries and ill health, some may experience further effects, including anger, anxiety, social isolation and other psychological problems.

Very few people suffer hearing loss from acoustic shock. To assist in the diagnosis in the few cases where this may occur, consideration could be given to baseline testing of all operators' hearing by a specialist when they commence work to establish their baseline hearing ability.

## **Control measures**

Possible control measures to implement to reduce the risk of acoustic shock occurring include:

- checking loud and/or high pitched noises and addressing causes;
- giving prompt attention to damaged equipment and network faults;

The equipment or network supplier or an acoustic specialist should be contacted if necessary.

- implementing a headset maintenance program;
- controlling background noise in the call centre;
- providing better quality headsets and installing acoustic shock protection devices in each phone set to control noises from narrow-band and broad-band interference and customer generated noise;

providing information and training to staff and supervisors so they can understand and identify
acoustic incidents as well as acoustic shock symptoms;

Means of implementing this control measure include providing training and procedures on:

- the proper fitting and use of headsets to reduce feedback;
- how to detect warning sounds indicating cordless phones are being used too close to the base station at the customer end and ask the customer to turn off the hands-free system and move away from the base station. Training on warning sounds should also prepare operators to know when to remove headsets as quickly as possible, where necessary; and
- procedures for recording acoustic incidents and possible sources and any symptoms suggesting acoustic shock.
- with hotdesking work, ensuring employees turn the headset volume down as soon as possible after a changeover, where there is a general practice during changeovers to turn up the volume;
- considering work organisation issues, such as unreasonable or unrealistic performance pressures
  or demands, which may be resulting in feelings of tension and distress; and
- preventing mobile phones from being used in call centres.

#### Management of acoustic incidents

The procedures for the management of incidents could be along the following lines.

After an acoustic incident, the employee should:

- i) remove the headset immediately;
- ii) in some circumstances, move to the 'break out' ('time out') area;
- iii) report the incident and any symptoms to the supervisor; and
- iv) discuss with the supervisor their ability to continue work and, where appropriate, relocation to another workstation.

After an acoustic incident, the employer/supervisor should:

- ensure the event is recorded and logged;
- ii) discuss the incident and ability to continue work with the employee;
- iii) where symptoms are persistent or severe, refer the employee to a general practitioner and/or an audiologist for assessment and treatment of injury;
- iv) enquire into the cause of the noise, including whether it is from an internal or external source;
- v) ensure the headset and other equipment are checked for clarity of sound and possible damage and faults;
- vi) review the adequacy of the noise control measures and general working environment; and
- vii) where there is damage or faults, remove the equipment from service.

Consideration should be given to the special needs of employees who have experienced acoustic shock, such as ensuring they are not exposed unnecessarily to controllable noises, such as loud alarms during fire drills.

#### **Further information**

The Australian Standard/Australian Communications Industry Forum, AS/ACIF S004:2004 Voice frequency performance requirements for customer equipment, available on the internet at www.acif.org.au

See also Section 6.3.1 Work- related stress

## 8.2 NOISE CONTROL

High levels of background noise can cause employees to turn up their headset volume and/or talk louder, resulting in the risk of employees feeling discomfort and tension, straining their voices, and potentially increasing the impact of acoustic incidents and the risks of acoustic shock occurring.

With hotdesking, background noise often increases during changeovers when new teams arrive, caused by people moving furniture and equipment and talking to one another.

A quiet working environment should be maintained, as far as practicable, to reduce employees' noise exposure.

### **Control measures**

Possible control measures to implement include:

reviewing the design and layout of the room and workstations;

Means of implementing this control measure include:

- reducing external and building service noises;
- reducing reverberation within the room by using sound absorbing materials; and
- placing acoustic barriers around/between workstations and other call centre and 'break out' ('time out') areas.
- training employees to control voice levels;
- encouraging people to not talk loudly or hold discussions near employees;
- locating fax machines, photocopiers and printers away from employees;
- · controlling radio noise and use of mobile telephones; and
- with hotdesking, ensuring changeovers are smoothly managed and quiet.

Means of implementing this control measures include:

- providing ample room for employees to move around at changeover times, without crowding; and
- providing instruction in advance (ie before employees move to the working area) to minimise discussions at workstations.

#### **Further information**

- The Commission's Code of practice: Managing noise at workplaces, available on the internet at www.worksafe.wa.gov.au and from WorkSafe.
- The Institute for Research in Construction (Canada), Indoor Environment Research COPE Project's web document, Open-plan office acoustical environment. This contains design strategies to reduce noise levels in open plan offices. It is available on the internet at www.irc.nrc-cnrc.gc.ca/ie/cope
- The National code of practice for noise management and protection of hearing at work [NOHSC: 2009(2004)], available on the internet at www.nohsc.gov.au

See also Sections 8.1 Acoustic incidents and 7.2 Vocal fatigue

## 9. HOTDESKING

'Hotdesking' is work where call handlers share workstations in relays for different tasks. Workstations are either shared or not assigned and operators sit at whichever desk is vacant.

Operators may carry their own equipment, such as headsets and task documentation, in a portable computer drawer to the vacant desk.

Particular consideration should be given to the following safety and health issues, which may arise during hotdesking:

- muscle and soft tissue injuries. Muscular strain risks can increase during hotdesking unless workstations are adjustable. For information and control measures, refer to Section 6 of this document, in particular Section 6.2;
- headset hygiene. For information and control measures, refer to the next section;
- background noise. This often increases during changeovers when new teams arrive, caused by people
  moving furniture and equipment and talking to one another. For information and control measures, refer to
  Section 8.2 of this document;
- acoustic incidents. The impact of these can increase when employees turn up their headset volume to overcome background noise during changeover times. For information and control measures, refer to Sections 8.1 and 8.2 of this document; and
- work-related stress. Feelings of tension and distress may arise during the changeover process.
   Consequently, good organisational planning should be implemented. For information and control measures, refer to Section 6.3.1 of this document.

#### **Control measures**

Apart from appropriate control measures outlined elsewhere in this document, possible ones to implement for hotdesking include:

- allowing adequate time for operators to adjust workstations;
- providing job-specific training;
- consulting with staff to explain the reasons for hotdesking and provide opportunities for staff to discuss concerns; and
- considering alternative working arrangements.

## **10. HEADSET HYGIENE**

Without proper hygiene, the sharing of headsets can spread respiratory and other infections such as 'tropical ear'.

As headsets are usually worn throughout a shift, they should be fully adjustable to ensure a comfortable fit.

This is particularly important if the ear piece sits at the entrance to the ear canal, rather than resting on the outside.

Headsets should be checked regularly and repaired or replaced immediately if necessary.

### **Control measures**

Possible control measures to implement include:

- providing employees with their own headsets;
- providing information and training in headset hygiene, use and maintenance;
- providing materials and time for staff to complete a headset hygiene program at the commencement of each shift; and
- providing supervision and instruction to remind employees of the hygiene requirements.

If sharing headsets is unavoidable, further control measures could include:

- ensuring employees have access to a sufficient supply of sterile ear pads and voice tubes or sterile wipes for cleaning headsets and voice tubes;
- ensuring ear piece foam covers and voice tubes are replaced between shared uses;
- ensuring ear pieces and voice tubes are cleaned with disinfectant between shared uses; and
- providing screen prompts to remind employees to adjust equipment and, if necessary, clean headsets before starting work.

#### Voice tubes

Voice tubes or mouthpieces can become blocked with food, make-up and dust, which affect the effectiveness of microphones. Employees must be trained on how to clean voice tubes to ensure correct volume and clarity and avoid the risk of strained voices and frustrated callers.

## 11. EMERGENCY PROCEDURES

See Appendix 3 Regulations 3.6, 3.7, 3.8, 3.9 and 3 10

There are minimum requirements for emergency preparations at the workplace, which employers must meet. These include:

• preparation of evacuation procedures and practice of them at reasonable intervals;

Employers must ensure procedures are developed for the controlled movement of people from the workplace in the event of different emergencies, such as fire, explosion, bomb or structural damage.

- providing clear and prominent display of the evacuation procedures and a diagram showing the location of exits and the position of the diagram in relation to the exits, where practicable;
- arrangement of the workplace so people can move safely within it, with passages for movement kept free of obstructions;
- ensuring emergency exits are safe in the event of an emergency and clearly marked;
- provision of regularly maintained and efficient fire extinguishers, which are located and distributed according to Australian Standard, AS/NZS 2444; and
- provision of appropriate training on how to use fire extinguishers and other safety equipment to people who will be required to help control or extinguish a fire.

Employees must be provided with:

- information on emergency procedures. This should address different types of emergencies, such as rescues, accidents or injuries;
- an induction on the emergency procedures; and
- training in the emergency procedures.

### **Further information**

The Commission's Guidance note: Preparing for emergency evacuations, available on the internet at www.worksafe.wa.gov.au and from WorkSafe.

## APPENDIX 1: OTHER SOURCES OF INFORMATION

## Legislation

Occupational Safety and Health Act 1984 Occupational Safety and Health Regulations 1996

These can be purchased from WorkSafe or the State Law Publisher, 10 William Street, Perth [Tel: (08) 9321 7688] and are also available on the internet at www.worksafe.wa.gov.au

## Australian and Australian/New Zealand Standards

AS 1680.2.2 Interior lighting — Office and screen-based tasks AS 1851 Maintenance of fire protection equipment series AS/ACIF S004:2001 Voice frequency performance requirements for customer equipment AS 2444 Portable fire extinguishers and fire blankets AS 3590.1 Screen-based workstations — Visual display units AS 3590.2 Screen-based workstations — Workstation furniture AS 3590.3 Screen-based workstations — Input devices AS 3745 Emergency control organisation and procedures for buildings AS/NZS 4438 Height adjustable swivel chairs AS/NZS 4443 Office desks AS/NZS 4443 Office panel systems — Workstations

## Codes of practice, guidance material and other documents

## Australian Building Codes Board

The Building Code of Australia (BCA). Refer to the internet site at www.abcb.gov.au

## Commission for Occupational Safety and Health

Code of practice: Managing noise at workplaces

Code of practice: Manual handling

Code of practice: Workplace violence

Codes of practice: First aid facilities and services, workplace amenities and facilities, personal protective clothing and equipment

Guidance note: Dealing with workplace bullying: A guide for employers

Guidance note: Dealing with workplace bullying: A guide for employees

Guidance note: Election of safety and health representatives, representatives and committees and resolution of issues

Guidance note: Electricity: Residual current devices

Guidance note: General duty of care in Western Australian workplaces

Guidance note: Preparing for emergency evacuations

Guidance note: Reducing the risk of fatigue at workplaces

Guidance note: Working alone

These are available on the internet at www.worksafe.wa.gov.au and from WorkSafe.

#### National Occupational Health and Safety Commission

Ergonomic principles and checklists for the selection of office furniture and equipment (1991).

Guidance note on the elimination of environmental tobacco smoke in the workplace [NOHSC: 3019(2003)]. This has been adopted by the Commission as a Western Australian guidance note, subject to a modification to Section 7. It is available on the internet at www.worksafe.wa.gov.au

National code of practice for noise management and protection of hearing at work [NOHSC: 2009(2004)]

National code of practice for the prevention of occupational overuse syndrome [NOHSC: 2013(1994)] This is an approved code of practice under the Occupational Safety and Health Act 1984.

National Occupational Health and Safety Commission documents are available on the internet at www.nohsc.gov.au

#### Health and Safety Executive (UK)

Sprigg, Christine A., Smith, Phoebe R., Jackson, Paul R. (2003). Psychosocial risk factors in call centres: An evaluation of work design and well-being. Health and Safety Executive Research Report 169. This is available on the internet at www.hse.gov.uk

#### Workplace Health and Safety Queensland

A guide to health and safety in the call centre industry. 2003. This is available on the internet at www.whs.qld.gov.au

#### Contacts for further information

Your relevant union or employers' association.

Chamber of Commerce and Industry Western Australia 180 Hay Street EAST PERTH WA 6000 Tel: (08) 9365 7415 Fax: (08) 9365 7550 Email: osh@cciwa.com Internet site: www.cciwa.com

UnionsWA Level 4, 79 Stirling Street PERTH WA 6000 Tel: (08) 9328 7877 Fax: (08) 9328 8132 Email: unionswa@tlcwa.org.au

WorkSafe Department of Consumer and Employment Protection Level 5, 1260 Hay Street WEST PERTH WA 6005 Tel: 1300 307 877 Fax: (08) 9321 8973 Email: safety@docep.wa.gov.au Internet site: www.worksafe.wa.gov.au TTY: (08) 9327 8838

Energy Safety Department of Consumer and Employment Protection 20 Southport Street WEST LEEDERVILLE WA 6007 Tel: (08) 9422 5200 Fax: (08) 9422 5244

# APPENDIX 2: LEGISLATIVE FRAMEWORK FOR OCCUPATIONAL SAFETY AND HEALTH IN WESTERN AUSTRALIA

## Legislative framework

The Occupational Safety and Health Act 1984 (referred to in this document as the Act) sets objectives to promote and improve occupational safety and health standards. It sets out broad duties and is supported by more detailed requirements in the Occupational Safety and Health Regulations 1996 (referred to in this document as the Regulations). The legislation is further supported by guidance material, such as approved codes of practice. This legislative framework is depicted below.

OCCUPATIONAL SAFETY AND HEALTH ACT 1984 supported by	<ul> <li>Major provisions in the Act include:</li> <li>the general duties;</li> <li>resolution of issues;</li> <li>safety and health representatives;</li> <li>safety and health committees; and</li> <li>enforcement of the Act and Regulations.</li> </ul>
OCCUPATIONAL SAFETY AND HEALTH REGULATIONS 1996	The Regulations set minimum requirements for specific hazards and work practices. They include references to national standards developed by the National Occupational Health and Safety Commission and Australian or Australian/New Zealand standards developed by Standards Australia or jointly by Standards Australia and Standards New Zealand.
and	
GUIDANCE MATERIAL	<ul> <li>Codes of practice approved for Western Australia in accordance with Section 57 of the Act.</li> <li>Guidance notes developed by the Commission for Occupational Safety and Health.</li> <li>National codes of practice and national standards developed by the National Occupational Health and Safety Commission.</li> <li>Australian standards developed by Standards Australia or jointly by Standards Australia and Standards New Zealand.</li> </ul>

## The meaning of practicable

Some of the general duty provisions in the Act and some requirements in the Regulations are qualified by the words 'so far as is practicable'.

'Practicability' applies to general duties for employers, self-employed people, people with control of workplaces, designers, manufacturers, importers, suppliers, erectors and installers and certain requirements in the Regulations. These people are expected to take practicable and reasonable measures to comply with the requirements.

If something is practicable, it is capable of being done. Whether it is also reasonable takes into account:

- the severity of any injury or harm to health that may occur;
- the degree of risk (or likelihood) of that injury or harm occurring;
- how much is known about the hazard and the ways of reducing, eliminating or controlling it; and
- the availability, suitability and cost of the safeguards.

The risk and severity of injury must be weighed up against the overall cost and feasibility of the safeguards needed to remove the risk.

Common practice and knowledge throughout the relevant industry are taken into account when judging whether a safeguard is 'reasonably practicable'. Individual employers could not claim they did not know what to do about certain hazards, if they were widely known within the industry and safeguards were available.

The cost of putting safeguards in place is measured against the consequences of failing to do so. It is not a measure of whether the employer can afford to put the necessary safeguards in place. While cost is a factor, it is not an excuse for failing to provide appropriate safeguards, particularly where there is risk of serious or frequent but less severe injury.

Where a regulation exists and is not qualified by the words 'as far as is practicable', it must be complied with as a minimum requirement.

### Provision of information

Employers must identify and provide information to employees to make them aware of risks at the workplace and enable them to perform their work safely. Information should be provided in a form all employees at the workplace can understand.

# APPENDIX 3: ACTS AND REGULATIONS REFERENCED IN THIS CODE OF PRACTICE

## Occupational Safety and Health Act 1984

## Duties of employers Section 19 of the Act states:

- (1) An employer shall, so far as is practicable, provide and maintain a working environment in which the employees of the employer (the 'employees') are not exposed to hazards and in particular, but without limiting the generality of the foregoing, an employer shall
  - (a) provide and maintain workplaces, plant, and systems of work such that, so far as is practicable, the employees are not exposed to hazards;
  - (b) provide such information, instruction, and training to, and supervision of, the employees as is necessary to enable them to perform their work in such a manner that they are not exposed to hazards;
  - (c) consult and co-operate with safety and health representatives, if any, and other employees at the workplace, regarding occupational safety and health at the workplace;
  - (d) where it is not practicable to avoid the presence of hazards at the workplace, provide the employees with, or otherwise provide for the employees to have, such adequate personal protective clothing and equipment as is practicable to protect them against those hazards, without any cost to the employees; and
  - (e) make arrangements for ensuring, so far as is practicable, that
    - (i) the use, cleaning, maintenance, transportation and disposal of plant; and
    - (ii) the use, handling, processing, storage, transportation and disposal of substances,
    - at the workplace is carried out in a manner such that the employees are not exposed to hazards.
- (2) In determining the training required to be provided in accordance with subsection (1)(b) regard shall be had to the functions performed by employees and the capacities in which they are employed.

### Breaches of Section 19(1) Section 19A states:

- (1) If an employer contravenes section 19(1) in circumstances of gross negligence, the employer commits an offence and is liable to a level 4 penalty.
- (2) If
  - (a) an employer
    - (i) contravenes section 19(1); and
    - (ii) by the contravention causes the death of, or serious harm to, an employee; and
  - (b) subsection (1) does not apply,

the employer commits an offence and is liable to a level 3 penalty.

- (3) If
  - (a) an employer contravenes section 19(1); and
  - (b) neither subsection (1) nor subsection (2) applies,

the employer commits an offence and is liable to a level 2 penalty.

- (4) An employer charged with an offence under
  - (a) subsection (1) may, instead of being convicted of that offence, be convicted of an offence under subsection (2) or (3); or
  - (b) subsection (2) may, instead of being convicted of that offence, be convicted of an offence under subsection (3).

### Duties of employees Section 20 of the Act states:

- (1) An employee shall take reasonable care
  - (a) to ensure his or her own safety and health at work; and
  - (b) to avoid adversely affecting the safety or health of any other person through any act or omission at work.
- (2) Without limiting the generality of subsection (1), an employee contravenes that subsection if the employee
  - (a) fails to comply, so far as the employee is reasonably able, with instructions given by the employee's employer for the safety or health of the employee or for the safety or health of other persons;
  - (b) fails to use such protective clothing and equipment as is provided, or provided for, by his or her employer as mentioned in section 19(1)(d) in a manner in which he or she has been properly instructed to use it;
  - (c) misuses or damages any equipment provided in the interests of safety or health; or
  - (d) fails to report forthwith to the employee's employer
    - (i) any situation at the workplace that the employee has reason to believe could constitute a hazard to any person that the employee cannot correct; or
    - (ii) any injury or harm to health of which he or she is aware that arises in the course of, or in connection with, his or her work.
- (3) An employee shall cooperate with the employee's employer in the carrying out by the employer of the obligations imposed on the employer under this Act.

## Breaches of section 20(1) or (3) Section 20A states:

- (1) If an employee contravenes section 20(1) or (3) in circumstances of gross negligence, the employee commits an offence and is liable
  - (a) for a first offence, to a fine of \$25 000; and
  - (b) for a subsequent offence, to a fine of \$31 250.
- (2) If
  - (a) an employee
    - (i) contravenes section 20(1) or (3); and
    - (ii) by the contravention causes the death of, or serious harm to, a person; and
  - (b) subsection (1) does not apply,

the employee commits an offence and is liable —

- (c) for a first offence, to a fine of \$20 000; and
- (d) for a subsequent offence, to a fine of \$25 000.
- (3) If
  - (a) an employee contravenes section 20(1) or (3); and

(b) neither subsection (1) nor subsection (2) applies,

- the employee commits an offence and is liable —
- (c) for a first offence, to a fine of \$10 000; and
- (d) for a subsequent offence, to a fine of \$12 500.
- (4) An employee charged with an offence under
  - (a) subsection (1) may, instead of being convicted of that offence, be convicted of an offence under subsection (2) or (3); or
  - (b) subsection (2) may, instead of being convicted of that offence, be convicted of an offence under subsection (3).

## Duties of manufacturers, etc. Section 23 of the Act states (in part):

- (1) A person that designs, manufactures, imports or supplies any plant for use at a workplace shall, so far as is practicable
  - (a) ensure that the design and construction of the plant is such that persons who properly install, maintain or use the plant are not in doing so, exposed to hazards;
  - (b) test and examine, or arrange for the testing and examination of, the plant so as to ensure that its design and construction are as mentioned in paragraph (a); and
  - (c) ensure that adequate information in respect of
    - (i) any dangers associated with the plant;
    - (ii) the specifications of the plant and the data obtained on the testing of the plant as mentioned in paragraph (b);
    - (iii) the conditions necessary to ensure that persons properly using the plant are not, in so doing, exposed to hazards; and
    - (iv) the proper maintenance of the plant,

is provided when the plant is supplied and thereafter whenever requested.

- (2) A person that erects or installs any plant for use at a workplace shall, so far as is practicable, ensure that it is so erected or installed that persons who properly use the plant are not subjected to any hazard that arises from, or is increased by, the way in which the plant is erected or installed.
- (3a) A person that designs or constructs any building or structure, including a temporary structure, for use at a workplace shall, so far as is practicable ensure that the design and construction of the building or structure is such that
  - (a) persons who properly construct, maintain, repair or service the building or structure; and

(b) persons who properly use the building or structure,

are not, in doing so, exposed to hazards.

## Breaches of section 23 Section 23AA states:

- (1) If a person contravenes section 23(1), (2), (3) or (3a) in circumstances of gross negligence, the person commits an offence and is liable to a level 4 penalty.
- (2) If
  - (a) a person
    - (i) contravenes section 23(1), (2), (3) or (3a); and
    - (ii) by the contravention causes the death of, or serious harm to, a person to whom a duty is owed under that subsection; and
  - (b) subsection (1) does not apply,

the person commits an offence and is liable to a level 3 penalty.

- (3) If
  - (a) a person contravenes section 23(1), (2), (3) or (3a); and
  - (b) neither subsection (1) nor subsection (2) applies,

the person commits an offence and is liable to a level 2 penalty.

- (4) A person charged with an offence under
  - (a) subsection (1) may, instead of being convicted of that offence, be convicted of an offence under subsection (2) or (3); or
  - (b) subsection (2) may, instead of being convicted of that offence, be convicted of an offence under subsection (3).

## Definition of penalty levels Section 3A states:

- (1) Where a person is liable to a level one penalty for an offence against this Act the person is liable
  - (a) if the offence was committed by the person as an employee-
    - (i) for a first offence, to a fine of \$5 000; and
    - (ii) for a subsequent offence, to a fine of \$6 250;
  - (b) if paragraph (a) does not apply
    - (i) in the case of an individual
      - (I) for a first offence, to a fine of \$25 000; and
      - (II) for a subsequent offence, to a fine of \$31 250;
      - or
    - (ii) in the case of a body corporate
      - (I) for a first offence, to a fine of \$50 000; and
      - (II) for a subsequent offence, to a fine of \$62 500.
- (2) Where a person is liable to a level 2 penalty for an offence against this Act the person is liable
  - (a) in the case of an individual
    - (i) for a first offence, to a fine of \$100 000; and
    - (ii) for a subsequent offence, to a fine of \$125 000;

or

- (b) in the case of a body corporate
  - (i) for a first offence, to a fine of \$200 000; and
  - (ii) for a subsequent offence, to a fine of \$250 000.
- (3) Where a person is liable to a level 3 penalty for an offence against this Act the person is liable
  - (a) in the case of an individual
    - (i) for a first offence, to a fine of \$200 000; and
    - (ii) for a subsequent offence, to a fine of \$250 000;
    - or
  - (b) in the case of a body corporate
    - (i) for a first offence, to a fine of \$400 000; and
    - (ii) for a subsequent offence, to a fine of \$500 000.
- (4) Where a person is liable to a level 4 penalty for an offence against this Act the person is liable
  - (a) in the case of an individual
    - (i) for a first offence, to a fine of \$250 000 and imprisonment for 2 years; and
    - (ii) for a subsequent offence, to a fine of \$312 500 and imprisonment for 2 years;

or

- (b) in the case of a body corporate
  - (i) for a first offence, to a fine of \$500 000; and
  - (ii) for a subsequent offence, to a fine of \$625 000.

## Occupational Safety and Health Regulations 1996

## Penalty for breaches by employees Regulation 1.15 states:

- (1) Subregulation (2) applies where 'the regulation 1.15 penalty' is specified in a penalty provision at the foot of a regulation or subregulation.
- (2) The applicable penalty is
  - (a) for a first offence, \$5 000; and
  - (b) for a subsequent offence, \$6 250.

# Penalty for breaches by employers and others Regulation 1.16 states:

- (1) Subregulation (2) applies where 'the regulation 1.16 penalty' is specified in a penalty provision at the foot of a regulation or subregulation.
- (2) The applicable penalty is
  - (a) in the case of an individual
    - (i) for a first offence, \$25 000; and
    - (ii) for a subsequent offence, \$31 250;
    - or
  - (b) in the case of a body corporate
    - (i) for a first offence, \$50 000; and
    - (ii) for a subsequent offence, \$62 500.

# Identification of hazards, and assessing and addressing risks, at workplaces Regulation 3.1 states:

A person who, at a workplace, is an employer, the main contractor, a self-employed person, a person having control of the workplace or a person having control of access to the workplace must, as far as practicable —

- (a) identify each hazard to which a person at the workplace is likely to be exposed;
- (b) assess the risk of injury or harm to a person resulting from each hazard, if any, identified under paragraph (a); and
- (c) consider the means by which the risk may be reduced.

Penalty: the regulation 1.16 penalty.

# Movement around workplace Regulation 3.6 states:

A person who, at a workplace, is an employer, the main contractor, a self-employed person or a person having control of the workplace must, where practicable, ensure that the workplace is arranged so that —

- (a) persons are able to move safely within the workplace; and
- (b) passages for the purpose of enabling persons to move within the workplace are at all times kept free of obstructions.

Penalty: the regulation 1.16 penalty.

# Access to and egress from workplaces Regulation 3.7 states:

A person who, at a workplace, is an employer, the main contractor, a self-employed person or a person having control of access to the workplace must, where practicable, ensure that the means of access to and egress from the workplace —

(a) enable persons to move safely to and from the workplace; and

(b) are at all times kept free of obstructions.

Penalty: the regulation 1.16 penalty.

# Emergency egress from workplaces Regulation 3.8 states:

A person who, at a workplace, is an employer, the main contractor, a self-employed person or a person having control of access to the workplace must ensure that the means of emergency egress from the workplace enable safe egress from the workplace in the event of an emergency.

Penalty: the regulation 1.16 penalty.

## Fire precautions Regulation 3.9 states:

- (1) If there is a risk of fire at a workplace then a person who, at the workplace, is an employer, the main contractor, a self-employed person or a person having control of the workplace must, as far as practicable
  - (a) provide regularly maintained and efficient portable fire extinguishers to control any fire likely to arise from the work being done at the workplace; and
  - (b) ensure that portable fire extinguishers are located and distributed at the workplace in accordance with AS 2444.

Penalty: the regulation 1.16 penalty.

(2) If, in any part of a workplace —

- (a) there are goods or materials which in the event of a fire are likely to burn with extreme rapidity, emit poisonous fumes or cause explosions; and
- (b) there is a risk of harm or injury to a person at the workplace resulting from the goods or materials being ignited,

then a person who, in the case of a construction site, is the main contractor or who, in the case of any other workplace, is an employer or a self-employed person, must ensure, where practicable, that no person smokes or introduces a naked flame into that part of the workplace.

Penalty: the regulation 1.16 penalty.

(3) A person must comply with a direction given for the purposes of subregulation (2).

Penalty for a person who commits the offence as an employee: the regulation 1.15 penalty.

Penalty in any other case: the regulation 1.16 penalty.

### Evacuation procedures Regulation 3.10 states:

A person who, at a workplace, is an employer, the main contractor, a self-employed person or a person having control of the workplace must ensure that —

- (a) there is an evacuation procedure to be followed in the event of fire or other emergency at the workplace;
- (b) where practicable, the evacuation procedure is clearly and prominently displayed at the workplace;
- (c) where practicable, a diagram showing the location of exits and the position of the diagram in relation to the exits is clearly and prominently displayed at the workplace;
- (d) where practicable, the evacuation procedure is practised at the workplace at reasonable intervals; and
- (e) persons at the workplace who would be required to help control or extinguish a fire at the workplace are appropriately trained and provided with appropriate protective clothing and equipment.

Penalty: the regulation 1.16 penalty.

# Work space generally Regulation 3.14 states:

An employer must, as far as practicable, provide each employee with sufficient space in which to work without risk to the employee's safety and health.

Penalty: the regulation 1.16 penalty.

#### Air temperature Regulation 3.15 states:

An employer must ensure ----

(a) that work practices are arranged so that employees are protected from extremes of heat and cold;

(b) if the workplaces is an a building or structure that, as far as practicable, heating and cooling are provided to enable employees to work in a comfortable environment.

Penalty:

- (a) in the case of an individual
  - (i) for a first offence, \$10 000; and
  - (ii) for a subsequent offence, \$12 500;

or

- (b) in the case of a body corporate
  - (i) for a first offence, \$20 000; and
  - (ii) for a subsequent offence, \$25 000.

# Identification and assessment of hazards in relation to atmosphere Regulation 3.38 states:

Without limiting regulations 3.1 and 3.32, a person who, at a workplace, is an employer, the main contractor or a self-employed person must —

- (a) identify each hazard arising from an oxygen deficient atmosphere or a toxic atmosphere to which a person at the workplace is likely to be exposed;
- (b) assess the risk of injury or harm to a person resulting from each hazard, if any, identified under paragraph (a); and
- (c) consider whether the risk may be reduced by any of the means referred to in regulation 3.39.

Penalty: the regulation 1.16 penalty.

# Possible means of reducing risks Regulation 3.39 states:

The means referred to in regulation 3.38(c) are —

- (a) the use of an effective ventilation system for the workplace;
- (b) the provision of an exhaust system that effectively extracts any contaminant and which is arranged so as to prevent re-entry of the extracted air into the workplace; and
- (c) such other means as would prevent persons at the workplace from being exposed to an oxygen deficient atmosphere or a toxic atmosphere,
- as is appropriate to the particular case.

# Atmosphere and respiratory protection — definitions Regulation 3.37 states:

In this Subdivision —

'filter' means a filter that complies with the requirements of AS/NZS 1715;

'oxygen deficient atmosphere' means an atmosphere containing less than 19.5% oxygen;

'self-contained breathing apparatus' means a type of supplied air respirator which is carried by the user and supplies the user with respirable air from a source carried by the user;

'supplied air respirator' means a device which, by means of an air line, air hose or apparatus carried by the user, supplies the user with respirable air from a source other than the ambient atmosphere;

'toxic atmosphere', in relation to a workplace, includes —

- (a) an atmosphere in which there is an atmospheric contaminant in a concentration exceeding the exposure standard for the contaminant specified in the National Exposure Standards [NOHSC: 1003(1995)];
- (b) where an inspirable dust or respirable dust is notwithin the scope of the Exposure Standards referred to in paragraph (a), an atmosphere in which a person at the workplace would be exposed to
  - (i) the inspirable dust that, when measured in accordance with AS 3640, exceeds 10 milligrams per cubic metre of air; or
  - (ii) the respirable dust that, when measured inaccordance with AS 2985, exceeds 5 milligrams per cubic metre of air,

as an average over a work period of 8 hours; and

(c) an atmosphere containing gas, vapour, dust or any other particle which is, or is in a concentration that is, a risk to the safety and health of a person at the workplace.

## Certain persons prohibited from smoking in enclosed workplaces Regulation 3.44B states:

A person who, at an enclosed workplace, is an employer, a self-employed person or an employee must not smoke in the enclosed workplace.

Penalty: the regulation 1.15 penalty.

# Defence: smoking in a designated area of workplace Regulation 3.44C states:

A person does not commit an offence under regulation 3.44B if, proof of which is on the person —

- (a) the person smokes in a designated smoking area;
- (b) the person is not working at the time he or she smokes; and
- (c) in the case of an employer, no employee is working in the designated area when the employer is smoking.

## Protection from tobacco smoke — definitions Regulation 3.44A states:

(1) In this Subdivision —

'designated smoking area' means an area of a workplace designated under regulation 3.44F(1) to be an area in which persons may smoke;

'enclosed workplace' means a workplace that has, whether permanently or temporarily —

(a) a ceiling or roof; and

(b) walls, sides or other vertical coverings,

so that when the workplace's existing closeable openings are closed, the workplace is completely or substantially enclosed;

'smoke' means smoke, hold, or otherwise have control over, an ignited tobacco product;

'tobacco product' has the definition it has in the Tobacco Control Act 1990.

(2) For the purposes of the definition of 'enclosed workplace' in subregulation (1) it is immaterial that an existing closeable opening is open at any particular time.

# Electrical installations at workplaces Regulation 3.59 states:

A person who, at a workplace, is an employer, the main contractor, a self-employed person or a person having control of the workplace must ensure that —

- (a) all electrical installations at the workplace are designed, constructed, installed, protected, maintained and tested so as to minimise the risk of electrical shock or fire; and
- (b) each connection on a flexible cord that is installed or renewed at the workplace after 1 October 1996 is of either the moulded one part non-rewireable or transparent type.

Penalty: the regulation 1.16 penalty.

# Protection against earth leakage current when portable equipment in use Regulation 3.60 states:

- (1) This regulation applies to a workplace other than one to which AS/NZS 3012 applies but does not apply to a workplace at which the supply of electricity
  - (a) does not exceed 32 volts alternating current;
  - (b) is direct current;
  - (c) is provided through an isolating transformer complying with AS/NZS 3108; or
  - (d) is provided from the unearthed outlet of a portable generator.
- (2) In this regulation
  - 'hand-held equipment' means portable equipment —
  - (a) of a kind that is intended to be held in the hand during normal use; and
  - (b) the motor, if any, of which forms an integral part of the equipment;

'portable equipment' means equipment that is —

- (a) connected to an electricity supply; and
- (b) intended to be moved when it is in use,

and includes, but is not limited to, hand-held equipment;

'workplace' means a workplace to which this regulation applies.

- (3) A person having control of a workplace
  - (a) must ensure that each non-portable residual current device installed at the workplace is kept in a safe working condition and tested on a regular basis to ensure its continued effective operation;
  - (b) must provide, where electricity is supplied to portable equipment through a fixed socket at the workplace, protection against earth leakage current by means of
    - (i) a non-portable residual current device installed at the switchboard; or
    - (ii) by a non-portable residual current device built into a fixed socket which, having regard to the primary use of the socket and its location, is likely to be used by a person operating portable equipment; and
  - (c) must ensure where a non-portable residual current device has been
    - (i) installed at a switchboard, that a notice is displayed in a prominent place at or near the switchboard indicating that a non-portable residual current device has been installed at the switchboard; or
    - (ii) built into a fixed socket, that the socket can be identified as providing protection against earth leakage current.

Penalty: the regulation 1.16 penalty.

- (4) A person who is an employer or a self-employed person at a workplace
  - (a) must ensure that each portable residual current device used at the workplace by the person or an employee of the person is kept in a safe working condition and tested on a regular basis to ensure its continued effective operation; and
  - (b) where the employer or a self-employed person is not satisfied that protection against earth leakage current has been provided by means of a non-portable residual current device
    - (i) must provide a portable residual current device for use with each item of portable equipment used by the person or an employee of the person at the workplace; and
    - (ii) must ensure that a portable residual current device is directly connected to the output side of a fixed socket and that an item of portable equipment being used by the person or an employee of the person is directly connected to the output side of that portable residual current device.

Penalty: the regulation 1.16 penalty.

(5) An employee who is provided with a portable residual current device for use with an item of portable equipment at a workplace must not use the portable equipment unless the portable residual current device is directly connected to the output side of a fixed socket and the item of portable equipment is directly connected to the output side of that portable residual current device.

Penalty: the regulation 1.15 penalty.

## APPENDIX 4: POSITIONING OF EQUIPMENT

## 1. Good posture

A good posture is one in which the employee is comfortable and well supported by properly adjusted furniture. This reduces muscle strain and fatigue.

A good posture can only be achieved by paying attention to the way the chair is adjusted, the height and distance of the VDU monitor, and the location of the source documents.

Some features of a comfortable posture for keyboarding are:

- shoulders relaxed;
- elbows level with home row of keys and close to sides of body;
- wrists straight;
- ample leg room;
- balanced, upright head position;
- backrest supports the lumbar part of the spine;
- avoid pressure on the thighs at the front edge of the seat; and
- feet firmly supported.

Note: Arms on chairs should not interfere with free movement of the chair or proper access to the keyboard.

## 2. Adjusting furniture

#### Fixed height desks

Chair height — adjust the chair so elbows are at the same level as the home row of keys.

Footrest — adjust its height and slope so the feet are comfortable and the knees are slightly higher than the hips. This will reduce pressure on the underside of the thighs and increase comfort.

## Adjustable height desks

Chair height — adjust the chair so the feet are flat on the floor and the knees are slightly higher than the hips.

Desk height — adjust the desk so the elbows are at the same level as the home row of keys.

#### Both types of desks

Lumbar support — adjust the height of the chair's back rest to support the lumbar curve (small) of the back. To find the lumbar curve, hold arms behind the back and comfortably clasp the opposite forearm near the elbow.

Seat depth — adjust the chair's seat depth so there is firm support by the back rest and three fingers can be inserted between the front of the seat and the back of the legs.

Screen — adjust the top of the screen (not the VDU case) to the level of the eyes. This puts the centre of the screen at a comfortable viewing angle. If the screen is too high, it puts strain on the neck muscles and may lead to aches and pains. Position the screen at a comfortable viewing distance, usually about a full arm's length from the sitting position to the screen centre.

Document holder — the ideal location for source material is adjacent to the screen and at the same visual distance from the user. The screen does not have to be directly in front — if the screen and source documents are used in about equal amounts, then the screen can be moved slightly to one side and the document holder moved closer to the midline so the head is not turned as much to either side. This reduces loading on the neck muscles.

![](_page_53_Picture_27.jpeg)

## 3. Selecting furniture

#### Desks

The top of the desk should be high enough and thin enough to enable the employee to adopt a comfortable posture, while also providing adequate clearance between the top of the employee's thighs and the underside of the desk top.

A short employee can sit at a high desk by using a footstool while the opposite does not apply (ie a tall employee cannot adopt the appropriate posture at a desk that is too low). Desks are therefore designed to suit taller employees. Consequently, this means that many shorter employees will require footstools.

Desks should also meet the requirements of one of the following:

- Australian Standard, AS 3590.2 Screen-based workstations Workstation furniture;
- Australian/New Zealand Standard, AS/NZS 4442 Office desks;
- Australian/New Zealand Standard AS/NZS 4443 Office panel systems Workstations; or
- National Occupational Health and Safety Commission (1991). Ergonomic principles and checklists for the selection of office furniture and equipment, available on the internet at www.nohsc.gov.au

### Additional requirements for desks

The desk should be deep enough to enable the employee to adopt a comfortable viewing distance.

For users of standard size screens (ie approximately 43 cm measured diagonally across the screen), the distance from the front edge of the desk to the screen should be a minimum of 55 cm. Users of larger screens may need to have the screen further away.

When using a standard size cathode ray tube screen, a desk depth of at least 85 cm to 90 cm is required.

If a standard size liquid crystal display screen is used, a desk with a depth of less than 85 to 90 cm is acceptable.

#### Chairs

Chairs should have a height adjustable seat pan and adjustable backrest. They should have an adjustment range that enables all the users to adopt a comfortable posture.

Chairs should also meet the requirements of one of the following:

- Australian Standard, AS 3590.2 Screen-based workstations. Workstation furniture;
- Australian/New Zealand Standard, AS/NZS 4438. Height adjustable swivel chairs; or
- National Occupational Health and Safety Commission (1991). Ergonomic principles and checklists for the selection of office furniture and equipment, available on the internet at www.nohsc.gov.au

### 4. Other issues

### Using a mouse

Many software packages now involve the use of a mouse. This has the advantage of reducing the number of keystrokes required to perform various functions; however, prolonged use of a mouse can cause discomfort in the arms and shoulders.

When using a mouse:

- keep it as close as possible to the side of the keyboard;
- hold it between the thumb and the fourth and fifth fingers. The second and third fingers should rest lightly on the mouse buttons; and
- use a mouse pad as this makes controlling it easier.

Where excessive mouse use is involved, some users may benefit from alternative mouse designs.

#### Wrist rests

Wrist rests were designed to support the wrists during the micro-pauses in between actual keying, such as when checking work. However, in practice, people often use the wrist rest while keying. This may increase the risk of a tendon strain and mechanical friction on the tendons that pass over the wrists to the fingers.

In this position, the fingers reach to the far keys rather than the whole arm generating that movement. This may cause strain of the muscles and tendons at the wrist.

The use of a wrist rest also places the keyboard further away from the user, which can increase sustained load on the shoulder muscles and cause discomfort or injury of the shoulder muscles.

## APPENDIX 5: CHECKLIST OF SAFETY AND HEALTH ISSUES

The safe	ety and health considerations for call centres include:
	General 'duty of care' Have safe systems of work been implemented so employees are not, as far as practicable, exposed to hazards? Are information, instruction, training and supervision provided to employees to enable them to work in a safe manner? For more information, see Section 2, as well as specific control measures outlined in Sections 5-10. See also the Commission's Guidance note: General duty of care in Western Australian workplaces.
	Risk management process Is there a regular risk management process in place? For more information, see Section 3.
	Consultation Are employees and safety and health representatives (if any) consulted on safety and health matters? For more information, see Section 2 and the Commission's Guidance note: Election of safety and health representatives, representatives and committees and resolution of issues.
	<ul> <li>Working environment</li> <li>Can employees move freely to and from amenities and other work areas?</li> <li>Are the electrical installations safe?</li> <li>Is there adequate ventilation and thermal comfort?</li> <li>Is there sufficient space between individual employees and groups of employees?</li> <li>Do the means of access and egress enable people to safely move to and from the workplace?</li> <li>Is the lighting appropriate for the work and work location?</li> <li>For more information, see Section 5 and the Commission's Codes of practice: First aid facilities and services, workplace amenities and facilities, personal protective clothing and equipment.</li> </ul>
	Working postures Can employees adopt postures at their workstations that minimise the risk of muscle and soft tissue injury? Do employees adjust the workstation and equipment before starting work? For more information, see Section 6 (in particular Section 6.2 Workstation design and setup), and Appendix 4 Positioning of equipment.

### Work organisation/job design

Do the jobs include, where possible, variation and flexibility with the ability to regulate tasks?

Are there adequate rest breaks for the purposes of changing posture and taking breaks from repetitive keying and voice use?

Has training been provided to develop job and stress management skills?

Are there customer contact procedures?

Are there policies and procedures for preventing and managaging violence and bullying? For more information, see Section 6 of this document.

The safety and health considerations for call centres include:		
	Fatigue Have fatigue management strategies been developed? For more information, see Section 7.1.	
	Vocal and visual fatigue Have employees received information and training on how to reduce the risks of developing throat and voice fatigue symptoms? Can employees adjust the screens, keyboards, headsets and other equipment to minimise eye and muscle strain and increase comfort? For more information, see Sections 7.2 and 7.3 and Appendix 4.	
	Acoustic incidents and noise control Are control measures in place to reduce the risk of acoustic shock occurring? Is the background noise minimised? For more information, see Section 8.	
	Hotdesking If hotdesking is carried out, have specific control measures been implemented to reduce the risks of injury or illness from this type of work? For more information, see Section 9.	
	Headset hygiene Have adequate infection control measures been implemented? For more information, see Section 10.	
	Emergency procedures Have the legal requirements for emergency preparations been met? For more information, see Section 11.	

CODE OF PRACTICE • OCCUPATIONAL SAFETY AND HEALTH IN CALL CENTRES

![](_page_58_Picture_1.jpeg)

![](_page_58_Picture_2.jpeg)

![](_page_58_Picture_3.jpeg)

## SURVEY OF USERS OF THIS CODE OF PRACTICE

The Commission for Occupational Safety and Health is seeking feedback on the Code of practice: Occupational safety and health in call centres — tell us what you think of it by answering the following questions, tearing out the form, and folding and posting it to WorkSafe (postage is free).

Your feedback will assist the Commission in evaluating the usefulness of this and other codes of practice, and further developing them.

1.	Has anyone in your workplace used the Code of practice: Occupational safety and health in call centres?	Yes	No
	If yes, who used it? (position title)		
2.	Has your workplace made changes to occupational safety and health management policies and procedures as a result of using the code of practice?	Yes	No
	If yes, what changes were made (select as many of the following as applicable):		
	Information and training provided on safe work practices		
	Rearrangement of the work environment		
	Review of workstations		
	Redesign of jobs		
	Implementation of new work procedures		
	Other (specify):		
3.	How do you rate the code of practice, overall, on a scaleNot usefulof usefulness from 1) Not useful at all to (5) Very useful?12	Very u 4	ıseful 5
4.	What are the least useful aspects of the code of practice?		
5.	What are the most useful aspects of the code of practice?		

## Contact details:

Organisation (optional):				
Industry:				
Number of workers at your site:	1-10	11-50	51-100	>100

1. Fold out here 🛛 🗇

2. Fold out here and secure with tape  $\stackrel{\leftarrow}{\rightarrow}$ 

![](_page_60_Picture_4.jpeg)

Delivery Address: PO Box 294 WEST PERTH WA 6872