

Insight aims to provide useful information, links and tips in the areas of Risk Management, Work Health and Safety, Business Continuity Management, and other areas relating to management systems and corporate governance.

Are you prepared for the new Psychosocial Code of Practice? Part 1

Employers in Australia have had quite a few years to get used to expectations around managing the physical aspects of workplace health and safety, with most states adopting modern OHS laws in the 1980s. Since the push towards harmonisation of legislation across the country that in Queensland resulted in the 2011 *Work Health and Safety Act and Regulations* (effective from 2012), we have also had a comprehensive suite of Codes of Practice to provide guidance on particular hazards or risks, and what is reasonably practicable to manage them.

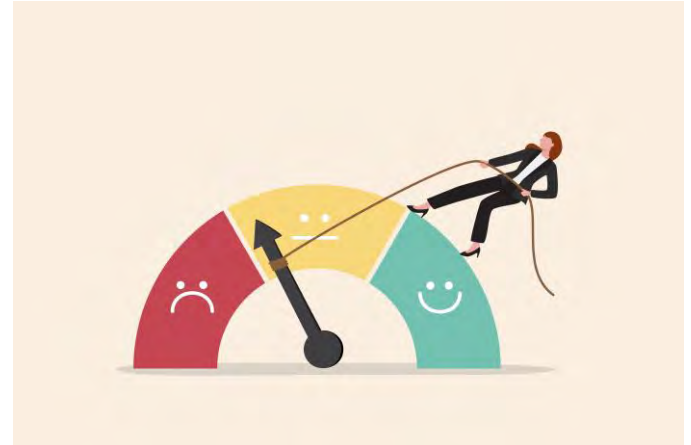
Now a new Code of Practice is being implemented that will require a step up for most workplaces: the *Managing the risk of psychosocial hazards at work Code of Practice 2022*.

This new Code of Practice (CoP) comes into effect on 1 April 2023. It's included in the Qld WHS Regulation, which means compliance with the CoP is mandated, not voluntary. It applies to all work and workplaces covered by the Qld WHS Act.

So, what does the new *Managing the risk of psychosocial hazards at work CoP* mean for workplaces?

'Health' under the WHS Act includes both physical and psychological health. This means PCBU's (persons conducting a business or undertaking) are expected to manage, as far as reasonably practicable, anything at work that may cause psychological or physical harm; that is, both psychosocial and physical hazards are to be managed. The adoption of the new CoP into Queensland WHS legislation means PCBU's must ensure that psychosocial hazards at work are effectively managed.

A psychosocial hazard is "a hazard that arises from, or relates to, the design or management of work, a work environment, plant at a workplace, or workplace interactions and behaviours and may cause psychological harm, whether or not the hazard may also cause physical harm".



Psychosocial hazards can arise from:

- the way the tasks or job are designed, organised, managed and supervised;
- tasks or jobs where there are inherent psychosocial hazards and risks;
- the equipment, working environment or requirements to undertake duties in physically hazardous environments; and
- social factors at work, workplace relationships and social interactions.

Some of the examples include:

- job design that places consistently too high, or too low, a demand on workers (e.g. consistently extreme time pressures, or consistently monotonous work);
- processes or culture resulting in low job control (e.g. being subjected to 'micro-managing', or workers are not consulted on decisions that impact them in their work);
- poor support from supervisors and/or co-workers (e.g. being given inadequate training for the required work, or being required to work in isolation);
- processes or culture resulting in low role clarity (e.g. workers receive conflicting instructions regarding work priorities, or work instructions are regularly changed without warning);

- poor organisational change management (e.g. lack of planning, consultation and/or communication when downsizing the business);
- low reward and recognition by management/supervisors (e.g. supervisors providing no constructive feedback, or criticising things outside of a worker's control);
- processes or culture resulting in poor organisational justice (e.g. management failing to deal with harassment or bullying complaints, or showing bias / favouritism in decision-making);
- poor and unmanaged workplace relationships (e.g. ongoing interpersonal conflict, or inappropriate behaviour is tolerated by management)
- remote or isolated work (e.g. lengthy periods of little / no contact with other workers or supervisors, or working in a location where emergency support isn't available)
- poor environmental conditions (e.g. working in extreme temperatures, or ongoing high noise levels)
- exposure to traumatic events (e.g. witnessing a fatality at work, or working in a role that requires regular response to emergencies)
- exposure to violence or aggression (e.g. being abused, threatened or assaulted by a co-worker or customer)
- exposure to work-related bullying (e.g. ongoing unjustified criticism, or spreading malicious gossip)
- exposure to workplace harassment, including sexual harassment (e.g. telling insulting jokes about a worker's race, or asking personal questions about a worker's body or appearance)
- job design or poor management resulting in fatigue (e.g. poorly designed work schedules, or excessive job demands)

All of these potential psychosocial hazards need to be managed, as far as reasonably practicable, by PCBUs as part of complying with Qld Work Health and Safety legislation.

It's noteworthy that changes to the Commonwealth *Sex Discrimination Act* introduced late last year also imposes a positive duty to prevent workplace sexual

harassment. By taking steps to manage the risks of harassment in the workplace, PCBUs can also be on the front foot in regard to this duty.

Stay tuned to *Insight* for part 2 of this article in March, in which we'll explore how you can ensure your organisation is compliant with the expectations for managing psychosocial hazards.

Please [contact QRMC](#) for more information.

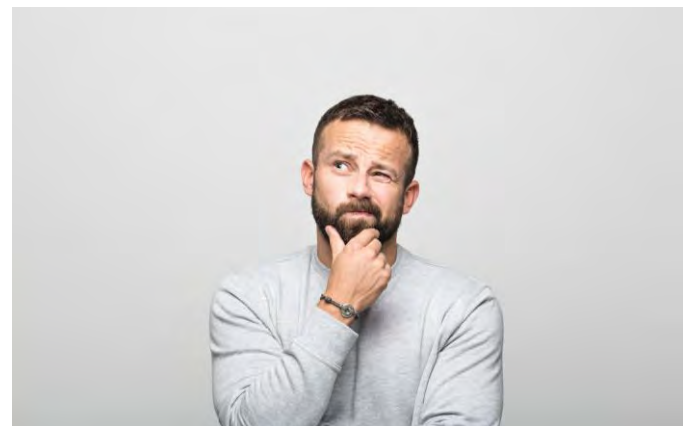
Who has access?

The issue of 'access' and 'accessibility' comes up in a number of the ISO Management Standards, and within a series of audit tools.

The term 'accessibility' has a number of different meanings / applications, but the most pertinent relate to:

- The characteristic of being able to be reached or obtained easily.
- The quality of being easy to understand.¹

How does this apply to management systems? Not only do operational personnel need to know where to find or how to log into Management System Policy, Procedures and documents, but the intent, meaning and information within these Procedures and documents needs to be easy to obtain, and (then leading to the second meaning) it needs to be easy to be understand.



¹ This concept of being easy to understand reflects the intent of Sec 39(3) from the WHS Regulation requiring that information,

training and instruction is provided in a way that is readily understandable.

Definitions aside, the requirement for having access to systems and processes feeds into the application of the management system requirements, with the access provided in a manner that makes it simple and straight-forward, almost fool-proof to comply with.

All too often we are seeing Management Systems that prompt us to question whether all that good quality information is 'accessible' (i.e. easy to understand) for the end-user. Posing the next question: what's the consequence when access isn't possible, or when documents that aren't easy to understand? (The obvious answer: People don't use or follow the required procedure and that's when incidents occur.)

To promote compliance, the concept of access needs to be underpinned by context (a key issue discussed in earlier sections of the Management Standards), with the context being broad enough to include:

- The end user and their level of comfort in reading management system requirements,
- The end user's understanding associated with managing the specific Quality / WHS/ environmental / etc. process, AND
- The amount of operational spare time and cognitive capacity they have (during work) to read, understand and then apply the management system requirements.

An important question for organisations to ask is: Are those lengthy word-dense procedures that are all technically correct really the right way to go, if the fundamental principle is to ensure that workers have access to, and comply with the management system requirements?

Please [contact QRMC](#) for more information.