Managing risks associated with COVID-19

Industry (Health and Safety) Standard

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Contents

Foreword

This is an Industry (Health and Safety) Standard (Standard) on how to manage the risks associated with COVID - 19.

Scope and application

This standard has been developed to assist Health and Safety Representatives (HSRs) in their function to monitor the measures taken by the employer/person conducting the relevant business or undertaking, or that person's representative, in compliance with the respective health and safety legislation which applies to their jurisdiction in relation to workers in their work group.

This Standard is intended to be of assistance to the employer/person conducting a business or undertaking (employer/PCBU), workers and other persons at a workplace. It provides practical guidance to all duty holders to ensure they are aware of control measures for managing the risks of COVID-19 to protect work-related health, safety and well-being.

How to use this Standard

This Standard includes references to the legal requirements under the OHS/WHS Acts and OHS/WHS Regulations. These are included for convenience only and should not be relied on in place of the full text of the Act or Regulations. The words 'must', 'requires' or 'mandatory' indicate a legal requirement exists that must be complied with.

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

Introduction

Management of the COVID-19 pandemic has required Australia to 'lock down', for people to 'stay at home except for essential activities' and for workplaces to either close or modify their operations to slow the spread, avoid health systems being overwhelmed and prevent unnecessary deaths.

As the way we work and interact changes, it's important to remember no single measure, including a vaccine, is sufficient on its own to prevent the spread of COVID-19. Following control measures to reduce the spread of the virus is not only a feature of how we now work, but how we live. This is because COVID-19 is a significant public health matter that has implications for workplaces that must be managed. While workplaces (and people in those workplaces) play a crucial role in managing the spread of COVID-19, which is reflected in this Standard, measures implemented by workplaces will only be effective if the community also plays their part, for example by following the public health rules of their jurisdiction and by staying at home when they have COVID-19 symptoms and/or are awaiting results of being tested for COVID-19.

As a public health matter, the risks of COVID-19 must be managed in accordance with public health laws in your jurisdiction and any other laws that apply. Depending on your state or territory, there may be a number of public health laws that apply to determine what you can, and cannot do, during this pandemic. These may include requirements relating to physical distancing, gatherings and the development or completion of plans or checklists – for example, some jurisdictions require some businesses to have COVIDSafe plans in place.

Public health laws, National COVID-19 Safe Workplace Principles and Safe Work Australia's industry guidance

The information in this Standard is necessarily general in nature. It should be read and applied in conjunction with state and territory public health laws, National COVID-19 Safe Workplace Principles and Safe Work Australia's industry guidance available at http://www.swa.gov.au/covid-19-information-workplaces.

Further practical guidance on COVID-19 is available on the AMWU website at COVID-19 Information For Workers - AMWU, ACTU website at Is your workplace COVID-Aware? | Australian Unions and from Work Health and Safety (WHS) regulators.

What is COVID-19 and what are its symptoms?

COVID-19 is the illness caused by the SARS-CoV-2 virus. The most common symptoms of COVID-19 are (in order of frequency): fever/chills; cough; sore throat; shortness of breath; fatigue; muscle pain; runny nose; and diarrhoea. Other reported symptoms include headache and loss or change of taste and smell.

Do people with COVID-19 always have symptoms?

Not always. Most people will develop symptoms, but these may take time. The incubation period for COVID-19 can be up to 14 days and symptoms generally do not appear for 5-7 days.

While people are most infectious when symptoms appear, people can start being infectious in the 1-2 days prior to developing symptoms. Further, people may be infectious but never develop symptoms.

How is COVID-19 spread?

The most likely way someone will catch the virus is through contact with respiratory droplets produced when an infected person speaks, coughs or sneezes. The droplets may fall directly into the person's eyes, nose or mouth if they are in close proximity with the infected person. Proximity is an important factor in how the virus is spread with 'close contact' presenting a higher risk of transmission.

A person can, however, also catch it via the hand-to-face pathway: touching a surface where live virus material is present, then touching their mouth, nose or eyes (otherwise known as fomite transmission).

There is potential for the virus to be transmitted via aerosols (airborne transmission) such as in clinical care settings. The risk for aerosol transmission may also be higher under certain conditions such as poorly ventilated indoor crowded environments.

How long can the virus survive on a surface?

Once on a surface, the virus can survive for hours and possibly up to days. Factors that affect survival are the surface material and prevailing environmental conditions. The virus has been shown to survive relatively well on smooth surfaces in cool.

COVID-19 is quite easily inactivated through appropriate cleaning. Information about cleaning and disinfecting can be found later in this document.

Who has duties in relation to COVID-19?

A number of duty holders have a role in managing the risks of COVID-19.

These include:

- ➢ Employers/Persons conducting a business or undertaking (EMPLOYER/PCBU)
- ➢ Persons with management and control of a workplace
- ➢ Officers
- ➢ Workers, and
- ➢ other persons at the workplace.

Employer/Person conducting a business or undertaking

The Employer/PCBU must eliminate risks to their workers and other persons that arise from the work of their business or undertaking, so far as is reasonably practicable. As a public health pandemic, it is not possible for an Employer/PCBU to eliminate the risks of COVID-19 to workers and other persons. Therefore, an Employer/ PCBU must minimise the risk of workers and other persons spreading and contracting COVID-19 that arise from the work of their business or undertaking, so far as is reasonably practicable.

Employers/PCBUs must not impose a levy or charge on a worker or permit a levy or charge to be imposed on a worker, for anything done, or provided, in relation to health and safety.

Persons with management and control of a workplace

Persons who have management or control of a workplace must ensure, so far as is reasonably practicable, that the workplace is without risk to the health and safety of any person, including in relation to the spreading and contracting of COVID-19. This means, for example, that a landlord or building manager may be required to implement measures, such as physical distancing, provision of hygiene facilities and cleaning of common areas, to manage the risks related to COVID-19.

Officers

Officers, for example company directors, have a duty to exercise due diligence to ensure the EMPLOYER/PCBU complies with the WHS Act and WHS Regulations. This includes taking reasonable steps to ensure the business or undertaking has and uses appropriate resources and processes to minimise the risks from COVID-19.

Workers

Workers have a duty to take reasonable care for their own health and safety and take reasonable care to not adversely affect the health and safety of other persons. This includes in relation to the risks of COVID-19. Workers must comply with reasonable instructions, as far as they are reasonably able, for example, an instruction not to attend work while they have COVID-19 symptoms, or while awaiting results of COVID-19 testing, and co-operate with reasonable health and safety policies or procedures that have been notified to workers, for example, washing hands on entry into the workplace.

Other persons in the workplace

Other persons at the workplace, like visitors or customers, must take reasonable care for their own health and safety and must take reasonable care not to adversely affect other people's health and safety. This includes in relation to the risks of COVID-19. They must comply, so far as they are reasonably able, with reasonable instructions given by the Employer/PCBU to allow that person to comply with the WHS Act, including any instructions in relation to physical distancing and hygiene while they attend the workplace.

Other relevant duties

Consulting workers

Employers/PCBUs must consult with workers who carry out work for the business or undertaking and who are (or are likely to be) directly affected by a health and safety matter.

This duty to consult is based on the recognition that worker input and participation improves decision-making about health and safety matters and assists in reducing work-related injuries and disease.

Workers are entitled to take part in consultations and to be represented in consultations by an HSR who has been elected to represent their work group and/or a union representative where it is required under previously agreed processes.

Employers/PCBUs must consider whether existing consultation requirements are sufficient in a COVID-19 environment. For example, if workgroups have been split up into different work crews for the purpose of physical distancing and elected HSR coverage is impacted, then the Employer/PCBU should consult with workers (or their representatives) on implementing new consultation and representation arrangements.

If workers are represented or assisted by an HSR the consultation must involve the HSR. Consultation must also occur in accordance with agreed procedures, this may include consultation with workers' representatives.

Employers/PCBUs must consult workers when making decisions about the risk of transmission of COVID-19 in the workplace, including what control measures are implemented. This may include, for example, what facilities are required, how to implement physical distancing and what will happen when a worker has COVID-19.

An Employer/PCBU who provides maintenance technicians to service plant and equipment in a client's workplace must consult, co-operate and co-ordinate activities with their client, making sure adequate controls are in place. They must also make sure their workers are able to comply with health and safety requirements whilst at these workplaces.

Information, training, instruction and supervision

The Employer/PCBU must ensure the provision of information, training, instruction or supervision that is necessary to minimise the risks to health and safety from work carried out as part of the business or undertaking. This includes providing up to date information on the risks of COVID-19 and any training necessary to address those risks in the workplace, including in relation to personal protective equipment.

Employers/PCBUs should use a combination of formal and informal communication methods (e.g., intranet, website, email, signs, posters and others) to ensure accessibility, including people for whom English is a second language and people with differing levels of literacy.

Work environment

A Employer/PCBU at a workplace must ensure, so far as is reasonably practicable, the provision of adequate facilities for workers, including toilets, drinking water, washing facilities and eating facilities.

To manage the risks of COVID-19 in the workplace, adequate and accessible facilities should take into account the need for increased routine cleaning, adequate supplies of disinfectant, cleaning products and sanitisers, and any new PPE required. Employers/PCBUs should also ensure that any physical adjustments made to workstations and equipment to allow for physical distancing do not introduce new health and safety risks (e.g., creating trip or crush hazards).

Emergency plans

Employers/PCBUs must ensure an emergency plan is prepared, maintained and implemented for the workplace. An emergency plan is a written set of instructions that outlines what workers and others at the workplace should do in an emergency. Employers/PCBUs should consider preparing or revising emergency procedures to deal with the specific situation of a worker or other person in the workplace being diagnosed with COVID-19 and any new processes required for evacuation (e.g., in case of a fire) to ensure physical distancing can, to the extent reasonably practicable, be maintained.

How can the risk of spreading and contracting COVID-19 be managed in the workplace?

Employers/PCBUs must implement control measures to manage the risk of COVID-19 entering and spreading in their workplace. Employers/PCBUs need to manage the risks of a person/persons in their workplace spreading and contracting COVID-19, including the risk that persons with COVID-19 may enter the workplace.

To understand the risks to workers and other persons, Employers/PCBUs should first consider the context of their business and how this has been impacted by the pandemic. For example:

➢ the requirements of public health laws
➢ how workers travel to work, including travel restrictions
➢ access to childcare and schooling, including school closures
➢ supply chain issues, including demand or availability of products/services
➢ changes in customer expectations or behaviours, including increased aggression and violence, and
➢ rates of COVID-19 in the surrounding community.

Employers/PCBUs must also consider the risks associated with COVID-19 in the context of their workplace, including the physical layout, the work carried out at the workplace and interactions between workers and other persons who attend the workplace.

Employers/PCBUs must take into account existing health and safety risks in their workplace, and the measures already in place to address those. The Employer/PCBU must:

➢ assess if these existing measures and controls need to be adjusted
➢ consider new WHS risks introduced by implementing additional measures to manage the risks of COVID-19
➢ plan and implement measures to address these new risks, and
➢ review this assessment regularly to ensure measures continue to be sufficient and whether any new risks have arisen.

Changes to work, systems of work or conditions at work may lead to the introduction of other risks, including psychological risks, or result in previously controlled risks no longer being adequately controlled.

For example, risks arising from:

- more workers working remotely, alone or in smaller groups
- increased and/or different use of PPE (for example pressure injuries from P2/N95 respirators)
- increased work demands (for example, changed duties, increased hours of work, work intensification or work overload due to operational changes)
- increased exposure to violence and harassment towards workers
- reduced access to appropriate amenities and facilities
- lack of suitable workstations and equipment when working from home, and
- increased cleaning and disinfecting, for example, risks of respiratory or skin sensitization from cleaning products.

Finally, in selecting controls, employers/PCBUs must have regard for the way the virus is spread, the duration and kind of contact people will have in the workplace, (for example, if it is face-to-face).

Special Leave Arrangements

It is imperative that leave arrangements of employers/PCBUs are complimentary to the controls put in place to protect workers and others in the workplace. Special leave arrangements must be designed to maximise compliance with Covid-19 policies and procedures so as to ensure that conflicting interests don't arise which may jeopardise compliance.

Particular attention must be focused on workers engaged in insecure work (i.e., labour hire, casuals), as they may not have access to leave or may perceive their engagement will be jeopardised if they were to take time-off. The risk of presentism will also increase as more people are vaccinated and are either asymptomatic or don't discern the risk they may present to others.

Special leave entitlements should be provided when workers:

➢ are waiting for results of PCR test,
➢ have receiving a positive PCR test and required to be in isolation,
➢ are stood down awaiting the workplace receiving an industrial 'deep' cleaning
➢ have been advised that are a close contact and must isolate.

Vulnerable people

Anyone who contracts COVID-19 can potentially experience severe disease; however, the likelihood of getting very sick, needing to be hospitalised, or dying from COVID-19 is higher for older people and people who have underlying conditions.

It is not an employer's/PCBU's role to determine an individual worker's level of vulnerability. Workers may provide advice to the employer/PCBU from their treating medical practitioners about their own circumstances which must be taken into account.

In consultation with workers and their representatives, employer's/PCBUs must undertake a risk assessment for a vulnerable worker that takes into consideration the characteristics of the worker, the features of the workplace and the nature of the work. Employers/PCBUs must implement appropriate control measures to minimise risks of exposure to COVID-19 to protect vulnerable workers from harm. Depending on the situation, measures may include appropriate and safe alternative duties or changed work locations, including work from home where possible.

A worker has the right to refuse work or cease work if there is a reasonable concern that they would be exposed to a serious risk to their health and safety from an immediate or

imminent hazard. In these cases, an Employer/PCBU may direct the worker to carry out suitable alternative work at the same or another workplace until it is safe to return to normal duties.

Employer's/PCBUs must treat all personal information in accordance with relevant privacy laws. Employers/PCBUs must also comply with workplace and anti-discrimination laws, this means they cannot move against a workers employment on the basis of medical advice where it has no direct influence on the inherent requirements of the job or where reasonable adjustments can be made.

What are the key control measures to manage the risks of COVID-19?

There is no completely reliable way to stop the spread of COVID-19 in a workplace. However, there are measures that can be taken to minimise this risk. This section sets out those measures. It is important to remember that not all measures will be required or appropriate for every workplace. See the Chapter 'When do control measures have to be implemented?'

Public health directions and WHS duties

It is important to remember this Standard should be read in conjunction with official government health advice, which may change over time. Compliance with public health directions does not necessarily mean that an employer/PCBU has met their health and safety duty. An employer/PCBU has a duty to manage the risks of exposure to COVID-19, so far as is reasonably practicable. It is likely that to meet their health and safety duty, employers/PCBUs will need to implement additional control measures beyond the minimum requirements stated in public health directions.

Vaccination

High rates of vaccination across the community is one of the cornerstones to navigating out of this pandemic. Vaccine take-up should be determined by individuals and public health experts, based on the best scientific evidence and ethical considerations. Support, education and trustworthy information for workers provides the best chance of Australia reaching required immunisation rates.

Developing immunity through vaccination means there is a reduced risk of developing the illness and its consequences. This immunity helps people fight the virus if exposed. Getting vaccinated may also protect people around those already vaccinated, because they are protected from getting infected and from disease, they are less likely to infect someone else.

There should be agreement around the role that vaccination plays in a COVIDSafe plan, if vaccination is being considered as part of workplace health and safety controls the following should be applied:

> ➢ It must not be the only control relied upon to manage the risk of covid-19 infection
> ➢ Paid vaccination leave for:
> > o time spent seeking and receiving advice from a qualified medical professional (workers doctor)
> > o travelling to and from and spent receiving vaccine, and

- covering any time away from work if a person suffers side effects (if required).
- ➢ Privacy (medical privacy) provisions
- ➢ Exemptions (i.e., medical reasons)
- ➢ Tailoring for CALD (NESB) workers
- ➢ Workplace education program
- ➢ Workplace communication program
- ➢ Systems to facilitate Workers Compensation or other compensation arrangements
- ➢ Voluntary (vaccination) access facilitation

Workers must never be required to be vaccinated by a vaccine in conflict with an Australian Technical Advisory Group on Immunisation (ATAGI) preference, recommendation or advice.

Workplace procedures and communication

To reduce the likelihood of transmission of the virus, workers and other persons who have COVID-19 symptoms, or who have or may have COVID-19 (for example, due to close contact with a confirmed case) should not enter or attend a workplace. A workplace should have a policy/procedure that requires workers and other persons to not attend a workplace if they:

- ➢ have symptoms of COVID-19, for example, a fever, cough or sore throat
- ➢ are being tested for COVID-19 and have been advised to quarantine by health professionals
- ➢ are in quarantine, for example, because they have returned from overseas
- ➢ have been in close contact with a confirmed case of COVID-19.

Workplace policies/procedures must be updated to remain current with advice from public health authorities. It is necessary to ensure that policies and procedures have review timeframes.

Consideration should be given to maintaining a register of when workers and other persons have attended the workplace or premises to make contact tracing more efficient. Public health directions in some jurisdictions require businesses and organisations to maintain such a register (QR code register).

Policies should make it clear that workers have the right to refuse work or cease work if there is a reasonable concern that they would be exposed to a serious risk to their health and safety from an immediate or imminent hazard.

Physical distancing

Physical distancing (also referred to as 'social distancing') refers to the requirement that people distance themselves from others. The current advice from the Australian Department of Health is that adults must keep at least 1.5 metres apart from others (outside of their household and family unit) where possible. Public health laws may also include density measures which limit the number of people allowed in certain workplaces or spaces.

Physical distancing is necessary because the most likely way of catching the virus is by breathing in respirable droplets from another person sneezing, coughing, or exhaling when in close contact with each other. Maintaining a physical distance of at least 1.5 metres from others where possible and taking steps to ensure appropriate and safe density in-line with public health or emergency management laws in your jurisdiction, will reduce the likelihood of exposure.

Ways to ensure physical distancing could include:

- supporting workers to work from home, where reasonably practicable
- adjustments to the layout of the workplace and workflows to enable workers and others to keep at least 1.5 metres apart, where possible, including how workers can move around the workplace, how workstations and work zones are set up, space in meal and toilet facilities, and how visitors, customers, clients, patients, visiting tradespeople, and others, can access the workplace
- work out how many people are permitted in an enclosed space and put-up posters to prevent overcrowding
- installing physical barriers where appropriate e.g., Perspex screens between workers and customers or between co-workers where physical distancing of 1.5 metres cannot be achieved
- using floor and wall markers to illustrate recommended distancing
- appropriate staffing ratios, this may require staggered start times and shifts or different rostering arrangements, so there are fewer workers at a workplace at the one time and less people entering the workplace at the same time
- limiting numbers using business vehicles, for example, on company mini buses where possible
- use of virtual meetings and gatherings
- limiting the number of workers and others allowed in enclosed workspaces, lunch areas, meeting rooms, lifts and facilities
- creating additional entry and exit points, including for high-risk work areas or sites – restricting pedestrians to one-way traffic, and
- creating additional parking or end of trip facilities.

Cleaning and disinfection

Appropriate and suitable cleaning and disinfecting processes for fixtures, fittings and plant at workplaces are necessary to minimise the risk of spreading or contracting the virus through contact with possible contaminated surfaces.

When and how often a workplace should be cleaned and disinfected will depend on a number of matters, including:

- the likelihood of contaminated material being present
- the type of workplace – high risk workplaces such as health care facilities, will need to be cleaned more regularly
- the time required to perform the work to an adequate standard,
- resources and equipment required.

However, generally:

- workplaces should be cleaned at least daily
- material, equipment and other objects entering the workplace that could be contaminated should be cleaned
- shared equipment should be cleaned after each use
- frequently touched surfaces such as door handles, counters, phones, debit/credit card payment machines, lift controls and amenities should be cleaned more regularly
- once cleaned, frequently touched surfaces should be disinfected
- surfaces that are visibly dirty, or have a spill, should be cleaned as soon as they are identified, regardless of when they were last cleaned, and
- workers must be provided with suitable cleaning and disinfecting products and instructed and trained on how to use them.
- Workers must also be provided suitable PPE to prevent COVID-19 transmission during cleaning and disinfection.

Changes to cleaning requirements may require additional changes to operations, including induction processes, rosters and time allocation to perform certain tasks.

Further information on cleaning and disinfecting is in [Safe Work Australia's cleaning guidance for COVID-19](#).

Good hygiene

A key measure for managing the spread of COVID-19 is good hygiene. Good hygiene includes everyone at a workplace, and could include:

> ➢ washing hands regularly with soap and water for at least 20 seconds and drying them completely, preferably with clean, single-use paper towels, including before eating and after using the toilet and after touching high touch surfaces such as lift buttons
> ➢ using an alcohol-based hand sanitiser with at least 60% ethanol or 70% isopropanol as the active ingredient regularly when it is not possible to wash hands
> ➢ coughing and sneezing into the elbow or a clean tissue and not spitting
> ➢ avoiding touching the face, eyes, nose and mouth
> ➢ disposing of tissues and cigarette butts hygienically, for example, in closed bins
> ➢ not sharing equipment, including desks and PPE, or where this is not possible, equipment being appropriately cleaned between uses
> ➢ not sharing food and drink or kitchen utensils, and
> ➢ having no intentional physical contact, for example, shaking hands and patting backs.

Ventilation

Ventilation is the deliberate introduction of fresh air and removal of stale air from a space. As COVID-19 can spread via droplets, not recirculating air or limiting the volume of recirculated air may help lower the risk of spreading the virus. All internal spaces should be well ventilated and, if possible, fresh air should be allowed to flow. In some workplaces high efficiency particulate air (HEPA) filtration will be required. Consultation with a ventilation engineer should occur to determine the specific requirements of a HEPA filtration system.

Ways to safely improve ventilation include to:

- avoid directing fans towards people's faces, such as by aiming them continuously towards the ceiling or floor. Limit oscillation and turbulence of fans
- regularly inspect, maintain and clean heating, ventilation and air conditioning (HVAC) systems
- avoid using only recirculated air in HVAC systems, and increase the outside air intake
- consider disabling ventilation controls with automated settings that reduce air supply based on temperature or occupancy, and
- ensure exhaust fans are operational if in place.

It is important for employers/PCBUs to monitor the ongoing effectiveness of ventilation in their workplace. A simple way of achieving this is by monitoring CO_2 levels. Although CO_2 levels are not a direct measure of possible exposure to COVID-19, checking levels using a monitor can help workplaces identify poorly ventilated areas. There are many different types of CO_2 monitors available. The most appropriate portable devices to use in the workplace are non-dispersive infrared (NDIR) CO_2 monitors.

Personal protective equipment

Personal protective equipment (PPE) refers to anything used or worn to minimise risk to worker health and safety. It can include items such as safety helmets, gloves, eye protection, high-visibility clothing, safety footwear and safety harnesses. It also includes respiratory protective equipment, such as face masks and respirators. It is crucial that if PPE is used in a workplace, all users are instructed how to safely put on and remove PPE. Unsafe use of PPE is a major infection control risk.

If other additional PPE is required to manage the risks related to COVID-19:

➢ training and instruction must be provided on when and how PPE should be used
➢ it must be provided free of charge
➢ it must be used appropriately, for example it must never be shared, and single use PPE must not be reused
➢ it must be correctly fitted, for example workers requiring P2/N95 respirators, must be fit tested to ensure that the mask is an appropriate fit for the user and forms an airtight seal
➢ it must be disposed of safely after use or appropriately reprocessed and stored if it is reusable
➢ if wearing PPE is likely to lead to increased fatigue, appropriate controls, such as increased breaks, should be considered.

Workers who are required to wear PPE for prolonged periods or in hot or humid conditions may experience negative physiological effects, including fatigue. Prolonged use of P2/N95 may also result in skin conditions including irritation and allergic reactions. Consideration must be given to implementing appropriate controls such as providing workers scheduled rest breaks in a suitable place with enough time to safely remove the mask and breathe in fresh air.

If workers are required to use PPE to protect against risks unrelated to COVID-19 they should continue to do so. Consideration should be given as to whether this PPE requires extra cleaning or more regular replacement due to the risk of COVID-19.

Employers/PCBUs must not rely only on PPE to control the risk of COVID-19 in their workplace. To do so may result in significant risk to the health of workers and failure to comply with WHS laws.

When do control measures have to be implemented?

Under health and safety laws, an employer/PCBU must implement all 'reasonably practicable' control measures to reduce the risk of COVID-19 spreading in the workplace. Whether a control measure is reasonably practicable will depend on a number of key factors such as the level of risk, the availability and suitability of the control measure and the costs associated with implementing the control measure.

Under health and safety laws, there is a clear presumption in favour of safety ahead of cost. The cost of eliminating or minimising risk must only be taken into account after identifying the extent of the risk and the available ways of eliminating or minimising the risk. Where the cost of implementing control measures, individually or together, is grossly disproportionate to the risk, it may be that implementing that option is not reasonably practicable.

In deciding which control measure you should implement and how, it is important to remember, a control measure will not be reasonably practicable if:

- it is inconsistent with a law, including a public health law (everyone must follow public health laws regardless of whether it may be considered reasonably practicable to do so)
- it is not appropriate for the workplace or the sort of work, for example, using a paper mask whilst welding
- it does not effectively minimise the risk of infection of COVID-19, for example, temperature checking visitors to your workplace.

No single measure is sufficient on its own to prevent the spread of COVID-19. Employer's/PCBUs must adopt the hierarchy of controls in determining the controls for their workplace. The most effective way to manage the risks of COVID-19 is through implementation of a combination of the key control measures to reduce people with COVID-19 being in a workplace, physical distancing, excellent hygiene, cleaning and disinfection and ventilation. Relying on PPE does not adequately protect workers and other people from the risks of COVID-19.

Risk management consultation

Employer's/PCBUs must consult with workers and, their representatives in relation to the management of all work health and safety risks before deciding which control measures to implement. It is particularly important in circumstances where risks to health and safety have changed due to the risk of spreading or contracting COVID-19 or where new risks arise from the introduction of infection control measures.

Consultation with workers will also help to reduce the risk of psychological harm caused by inadequate communication regarding risks to health and safety posed by the potential of contracting COVID-19.

Monitoring and reviewing control measures

PCBUs should review, and as necessary, revise all implemented control measures so as to reduce the risk of COVID-19 entering and transmitting in the workplace. When deciding on control measures, Employer's/PCBUs should also consider how the effectiveness of the controls will be monitored, timeframes for when the control will be monitored and by whom.

The health and safety of workers must also be monitored to ensure workers are not adversely affected as a result of the implementation of controls.

Rapid Antigen Testing

Rapid antigen testing should form part of the monitoring of the effectiveness of controls in a workplace. It can also play a role in stopping workers or others from entering the workplace if they have contracted Covid-19. Rapid antigen testing must be carried out in accordance with the Therapeutic Goods Administration Conditions of supply for rapid antigen tests.

For rapid antigen testing the following must apply:

- performed in paid time – prior to starting work
- Whilst waiting for the test result [up to 20 minutes], interactions between people must be minimised e.g., separate space

- If the result is not negative the person must not enter the workplace until a negative PCR test result is obtained
- The employer/PCBU must organise transport (or ensure suitable transport) for a worker to attend a PCR test if they return a non-negative rapid antigen test.
- Paid leave must be available for all workers required to isolate whilst awaiting PCR results and if positive until a negative PCR test is obtained and their provided a medical clearance
- Everyone must be subject to tested (regardless of role)
- Any private information must not be shared with the employer/PCBU
- The employer/PCBU should receive only the results.

Any workplace policy on Rapid Antigen Testing should include:

- The purpose, scope and duration of testing
- Risks assessments that have led to the introduction of the policy
- The type and frequency of the testing (every 2-3 days to be effective and useful)
- The testing procedure and who will conduct the testing
- How information about testing is stored and may be shared
- All mandatory testing is done on paid time, and that workers are provided with paid leave until they get the results of testing, and paid leave if required to isolate
- A fair and agreed process if a worker is unable or unwilling to participate

Communicating control measures

Control measures are most effective when workers and other persons fully understand what they are, and what is expected of them to comply. Employer's/PCBUs must provide information and guidance on all control measures, including regular reminders and additional information should they change or if additional controls are implemented. Signage, posters and workplace voiceovers are ways of communicating what control measures apply in the workplace. A combination of formal and informal communication methods (e.g., intranet, website, email, signs, posters and others) to ensure accessibility, including people for whom English is a second language and people with differing levels of literacy should be used.

Psychological health and safety

COVID-19 presents a wide range of risks to workers' psychological health and safety, as well as their physical health and safety. These risks may be associated with changes in working conditions and concerns about contracting or spreading the virus. Increased anxiety among the general population also means that workers in certain sectors may be at risk of increased exposure to violence, harassment, abuse and aggression.

The psychological risks in relation to COVID-19 include those from:

- isolated or remote work and prolonged absences from home
- poor or confusing communication
- difficulty balancing paid work and caring responsibilities
- high, low or changed job demands
- increased or decreased workload
- reduced social support from managers and colleagues
- poor management of workplace changes, and
- increased exposure to domestic and family violence.

Employer's/PCBUs must eliminate psychosocial risks related to COVID-19 in the workplace, or if that is not reasonably practicable, minimise those risks so far as is reasonably practicable. PCBUs must consult with workers when identifying and assessing psychosocial risks, and when making decisions about ways to eliminate or minimise risks.

What should an employer/PCBU do where there is a case of COVID-19 in the workplace?

If someone is confirmed as having COVID-19 or is getting tested for COVID-19, the employer/PCBU must direct them not to attend the usual workplace. This includes clients, customer or other visitors. The employer/PCBU should ensure that they follow the advice of public health officials in relation to measures they must take for example, isolation periods.

Where the employer/PCBUs reasonably suspect someone in their workplace as having COVID-19, for example, they have the relevant symptoms and/or have been in contact with a confirmed case, the employer/PCBU must isolate that person as soon as possible from others at the workplace. The employer/PCBU must also provide appropriate PPE, such as a disposable surgical mask, hand sanitiser and tissues, if possible. The employer/PCBU must also ensure anyone assisting the person has appropriate PPE and is instructed on how to safely provide assistance.

The employer/PCBU must ensure that the person leaves the workplace as soon as possible, to the extent reasonably practicable, to minimise the risk of transmission. The employer/PCBU must ensure the person has transport home, to a location they can isolate, or to a medical facility if necessary.

The employer/PCBU should ensure that they have current contact details for the person and information about the areas they have been in the workplace, who they have been in close contact within the workplace and for how long. This will inform the employer/PCBU about risks to others and areas to clean and disinfect. This information may also assist the state or territory public health unit if they need to follow up at a later time.

The state or territory health and safety regulator may also be able to provide specific health and safety advice on the situation.

If the person has serious symptoms such as difficulty breathing, the employer/PCBU must ensure that emergency services is notified (on 000) and urgent medical help is sought.

Workers who have been isolated after having tested positive for COVID-19 can return to work when they have fully recovered and have met the criteria for clearance from isolation.

The criteria may vary depending on circumstances of the workplace and states and territories may manage clearance from isolation differently. Clearance may be by the public health authority or the person's treating clinician.

There are specific criteria for clearance which apply to health care workers and aged care workers. As these may change, these workers should check with a medical practitioner or the public health authority as to whether the criteria for clearance from isolation has been met before they return to work.

Workers who have completed a specified quarantine period (either after returning from travel or because they were a close contact with a confirmed case), and who did not develop symptoms during quarantine, do not need a medical clearance to return to the workplace. These workers do not need to be tested for COVID-19 in order to return to work. However, workers should closely follow the instructions provided by the state or territory public health authority, which in some cases may include being tested for COVID-19.

Clean and disinfect

The employer/PCBU should immediately close off and refuse access to any areas that the person may have entered (affected areas) until they have been appropriately cleaned and disinfected. The employer/PCBU should increase natural air flow, if possible, in affected areas, for example, by opening outside doors and windows. All affected areas must be appropriately cleaned and disinfected.

The employer/PCBU must ensure that cleaners wear appropriate PPE, to the extent reasonably practicable, for example disposable gloves or gloves appropriate to the cleaning chemicals being used, and safety eyewear to protect against chemical splashes.

There is no automatic requirement under health and safety laws to close an entire workplace following a suspected or confirmed case of COVID-19. The employer/PCBU must consider whether this is a reasonably practicable control measure in the circumstances, for example, if the worker has been in contact with all of the workplace, it may need to be closed until cleaning and disinfecting is undertaken. However, it would not be necessary if the worker has only visited parts of the workplace or if government health officials advise that the risk of others being exposed in the workplace is very low.

Whether the employer/PCBU needs to suspend operations in the workplace will depend on factors such as the size of the workplace, nature of work, number of people and suspected areas of contamination in the workplace.

Notifiable incidents

If someone at the workplace is confirmed to have, or suspected of having, COVID-19, an Employer/PCBU may need to notify the relevant WHS regulator under health and safety laws or the relevant health agency under public health laws. You should seek advice from your health and safety regulator and relevant Health Department on the reporting or other measures that are necessary for you to take.

Appendix 1 Controls Checklist

AMWU COVID-19
Controls Checklist

How to use:

You will be provided an opportunity to score each section of this checklist. Any areas which are ticked as 'not applicable' should be considered as compliant for the purpose of scoring.

• If you score in the green, keep up the good work, but the job's not over. Remember HSRs have a role to monitor the health and safety compliance of the employer/PCBU and their representatives.

• If you score in the amber, there's room for improvement. Are you using all your rights under the health and safety laws? Do we need to be more organised? Pick on three of the areas that lowered your score. With the members and other HSRs/Delegates decide on what action is needed.

• If you score in the red, our members are at an elevated risk of exposure, immediate action is required. By the sounds of things your employer/PCBU thinks workers have no role to play in health & safety or rights. Decide on three problems that the members agree need immediate attention. Set a timetable for your employer to fix them.

You may need to:
- • Direct a cease work
- • Issue a PIN,
- • Negotiate an agreement with your employer about how they are going to improve their performance, or get AMWU assistance.

Actions/Controls	Compliant	Non-compliant	Not applicable
Risk Management			
A site-based Health and Safety Risk Assessment has been undertaken relating to COVID-19.			
Documented risk assessment for each task, identifies points of interaction/potential exposure and what the controls are in place to limit interaction/exposure.			
Covid Safe Plan updated and reviewed by suitably experienced person following consultation.			
Regular communication is in place with all staff (on-site and those working remotely) to ensure workers have the ability to identify exposure risk.			
There are records that workers have been provided training/information on workplace COVID-19 procedures and requirements.			
SCORE	5-4/5 **Green**	3/5 **Amber**	2-0/5 **Red**

1

Actions/Controls	Compliant	Non-compliant	Not applicable
Social Distancing (amongst workers)			
Signage is in place to support physical distancing and guiding the distance where people may sit/stand (reception, lunchroom, etc.).			
No ucnecessary contact between workgroups within the workplace.			
Distance visual indicators, such as markings on the floor, to emphasise how far apart people should be.			
The distance between workstations is at least 1.5m and workers are not facing each other.			
Pre-starts are held outside (where practical) and everyone is at least 1.5m apart.			
Shift rotation has been reviewed and where possible staggered meal breaks, and flexible working arrangements implemented.			
If shift work is occurring changes made to start and finish times to ensure that there is no crossover of workers (if no shift work tick compliant).			
All lunchrooms have been assessed and clear signage which limits the number of people and furniture arranged to reduce seating capacity to support social distancing.			
Additional washing facilities, change rooms and dining facilities provided (if rostering alone cannot limit numbers).			
SCORE	9-8/9 **Green**	7-5/9 **Amber**	4-0/9 **Red**

Actions/Controls	Compliant	Non-compliant	Not applicable
Social Distancing (with others)			
All steps should be taken to eliminate where possible, or minimise, physical interactions amongst people.			
Where workers are required to deal with third parties, physical barrier (such as plastic screen) installed.			
Meetings have been scheduled to occur virtually or by phone. If on-site outdoor open spaces are used.			
Limiting physical interaction with suppliers/delivery & courier drivers. If suppliers are required on-site a pre-determined plan on how social distancing will occur is put in place.			
Reduced non-essential visitors and non-essential contractors and consultants on site.			
Site inductions include all COVID-19 health and hygiene and social distancing requirements.			
Workers allowed to refuse to service sites that are not complying with hygiene.			
SCORE	7-6/7 **Green**	5-4/7 **Amber**	3-0/7 **Red**

Actions/Controls	Compliant	Non-compliant	Not applicable
Vehicle and Machinery Hygiene			
Checks are in place to ensure all vehicles and machinery is cleaned between operators (this must be undertaken at every instance when an operator both enters and leaves a cab or workstation after a period of operating).			
Hand sanitiser and cleaning materials is readily available for all operators.			
Controls are in place for physical distancing within vehicles & plant (such as 1 person per vehicle).			
Processes are in place to avoid the need for hot seating mobile plant. Where hot seating occurs, appropriate cleaning of the cabin and access points is undertaken between use.			
Communications between operators are via 2-way radio or similar.			
Carpooling when travelling to and from work is avoided and staff travel in a single vehicle.			
SCORE	6-5/6 Green	4-3/6 Amber	2-0/6 Red

Actions/Controls	Compliant	Non-compliant	Not applicable
Health and Isolation			
Rapid antigen testing is provided in the workplace so as to assist in monitoring the effectiveness of controls and minimise the risk of a person infected with COVID-19 entering the workplace.			
Sign-in provisions are in place and compliant with state/territory requirements (QR code sign-in).			
Checks are in place daily to identify any worker or supplier that is on-site who displays any COVID-19 symptoms and protocols to immediately isolate/remove them.			
Checks are in place to assess those who may have been exposed (or at higher risk), in close contact with a confirmed or probable case of COVID-19, to remove themselves from site and follow self-isolation protocols in line with health requirements.			
Instructions have been issued to all staff requiring any person displaying flu-like symptoms or feeling unwell to stay at home and away from work, to inform their manager, undertake testing and appropriate medical treatment.			
Special paid leave is available for any worker who is required too self-isolate (awaiting test result, close contact, COVID-19 positive)			
Checks have taken place to determine all workers that are at high risk or due to medical conditions (being immunocompromised or caring for people who are high risk) and controls put in place to reduce their risk of COVID-19 exposure.			

3

Actions/Controls	Compliant	Non-compliant	Not applicable
The flu vaccine is being made available to staff i.e., vaccination in paid time.			
The First Aid Officer(s) has been trained in COVID-19 risks and management and appropriate PPE is available			
There are plans in place for supporting workers' mental health and providing access to support i.e., AMWU Care.			
SCORE	10-8/10 Green	7-5/10 Amber	4-0/10 Red

Actions/Controls	Compliant	Non-compliant	Not applicable
Sanitation			
Ensure appropriate health, hygiene and safety measures are in place and cleaning is regular to minimise risk.			
Training provided to workers in hand washing and disinfection of surfaces e.g., mobile phones, keyboards, UHF radios, steering wheels, etc.			
There is increased availability of hygiene controls such as hand sanitiser and disinfectant wipes at all work locations, vehicles and the supply are regularly checked.			
An increased cleaning schedule is in place and maintained for: • All physical spaces, especially between workers coming into contact e.g., bathrooms, meal rooms, shared facilities; • Items such as plant, monitors, desks, tools, keyboards, to ensure items are thoroughly cleaned between use by individuals.; • High touch point areas – such as turnstiles, door handles, counters and light switches.			
Consideration has been given to determine if specialised cleaning crews are needed.			
SCORE	5-4/5 Green	3/5 Amber	2-0/5 Red

Actions/Controls	Compliant	Non-compliant	Not applicable
Working From Home and Travel			
Staff are provided the option to work from home where appropriate to do so. The working environment of staff working from home is assessed as appropriate from a health and safety perspective.			
A schedule of supervision and support is in place to ensure staff working from home are supported.			
A communication plan is in place for the whole site and includes staff working remotely and from home.			
SCORE	3/3 Green	2/3 Amber	1-0/3 Red

Appendix 2 Links to Health Orders and Directions

Australian Capital Territory
- ACT Government - ACT Public health directions
- ACT Government - Business resource kit (go to COVID safety plan guidelines)

New South Wales
- NSW Health - Public health orders
- NSW Government - COVID-19 Safety Plan

Northern Territory
- Northern Territory Government - Chief Public Health Officer directions
- Northern Territory Government - COVID-19 Safety Plan checklist

Queensland
- Queensland Health - Chief Health Officer public health directions
- Workplace Health and Safety Queensland - Work health and safety plan for COVID-19
- Queensland Government - COVID Safe checklists and factsheets
- Business Queensland - Industry COVID Safe plans

South Australia
- Government of South Australia - Emergency Declarations and Directions
- Government of South Australia - COVID-Safe plan form

Tasmania
- Tasmanian Government - Coronavirus disease (COVID-19) Resources (under the heading 'Current Directions')
- WorkSafe Tasmania - COVID19 Safety plan templates and checklist

Victoria
- Victorian Department of Health and Human Services - Restriction levels
- Business Victoria - COVID-19 industry guidelines

Western Australia
- Western Australian Government - State of Emergency declarations
- Western Australian Government - Business tools and information

Commonwealth

Biosecurity laws cover issues such as travel restrictions, cruise ships, international airports and remote communities.
- Biosecurity (Human Biosecurity Emergency) (Human Coronavirus with Pandemic Potential) (Overseas Travel Ban Emergency Requirements) Determination 2020 (25 March 2020)
- Biosecurity (Human Biosecurity Emergency) (Human Coronavirus with Pandemic Potential) (Emergency Requirements – Retail Outlets at International Airports) Determination 2020 (28 March 2020)
- Biosecurity (Human Biosecurity Emergency) (Human Coronavirus with Pandemic Potential) (Emergency Requirements for Remote Communities) Determination 2020 (5 June 2020)
- Biosecurity (Human Biosecurity Emergency) (Human Coronavirus with Pandemic Potential) (Emergency Requirements for Cruise Ships) Determination 2020 (21 May 2020)