

# The Management of Occupational Health & Safety Hazards in Commonwealth Agencies

Are you relocating or  
closing an office?



**Australian Government**

**Comcare**

## **Acknowledgements**

Comcare gratefully acknowledges the development work of the Department of Employment, Education, Training and Youth Affairs in the production of this booklet.

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For an authoritative understanding of the legislation in relation to occupational health and safety and Commonwealth employment, you are directed to the relevant legislation, in particular the Occupational Health and Safety (Commonwealth Employment) Act 1991. This booklet should be read in conjunction with relevant legislation, it is not a substitute for such legislation.

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ISBN — 1 876700 56 4 (on-line)

ISBN — 1 876700 57 2 (hardcopy)

## **Publishing Notice**

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# 1. Introduction

Comcare aims to reduce the incidence and severity of workplace injury and disease in Commonwealth employment.

In the area of occupational health and safety (OHS), Comcare has two main roles:

- providing assistance to employers to prevent injury and disease, and
- monitoring and enforcing the laws which protect the health and safety of Commonwealth employees and the public.

## Prevention

Comcare's prevention activities include:

- providing information and advice
- promoting health and safety management systems
- adopting and developing resource material including codes of practice, guidance notes, training material, and a wide range of health and safety books and leaflets
- developing co-operative relationships with agencies to promote best practice in health and safety management
- implementing a targeted Prevention Program within Commonwealth agencies, and
- providing a Freecall OHS Hotline (1300 366 979).

## Purpose of this booklet

The purpose of this booklet is to assist employers and employees to carry out their responsibilities under the *Occupational Health & Safety (Commonwealth Employment) Act 1991* (the OHS(CE) Act). It is intended that you use the booklet as a guide to addressing the types of issues which will arise in your workplace during an office closure or relocation process. It is based on a hazard management approach that aims to eliminate or reduce the risk of injuries and illness before the event.

A hazard management approach to closing or moving an office, will ensure risks to health and safety are minimised before commencing the task. It will enable the move to be carried out more effectively and efficiently, reduce costs and assist an employer in their efforts to fulfil their duty of care to their employees.

## 2. Overview of OHS Responsibilities

In closing or relocating an office, there are different roles and responsibilities for all staff and other parties involved in the process including:

- managers and supervisors
- staff, and
- contractors.

### Managers and supervisors

In times of organisational change, which involves staff and/or office closure or relocation, people's needs are sometimes overlooked.

Regardless of other pressures, supervisors and managers are still responsible under the OHS(CE) Act for the health and safety of staff, which includes undertaking OHS hazard management.

They must:

- plan for and put in place procedures to monitor the health and safety of employees for whom they are responsible
- ensure hazards in the workplace are identified, and
- ensure appropriate control measures are put in place.

These activities should be undertaken in a safe manner, using accepted practices.

### Staff

Under the OHS(CE) Act, employees are required:

- not to create or increase risks to themselves or others' health and safety
- to co-operate with the employer to help them to meet their duties under the OHS(CE) Act
- to use equipment safely as instructed by the employer, and
- to alert management to any additional hazards in the workplace during the shift.

The responsibilities and tasks staff will have in the close down/relocation process could include:

- being aware of the process and any safety instructions
- providing feedback where necessary/appropriate
- organising office files for packing and transport, the cleaning up of storage and common areas
- cleaning up personal items and space, and
- cleaning up the computer hard disk.

**Example:**

Employees may, in their endeavour to assist in the process of relocation or closure, move equipment, furniture and boxes without first considering whether it is safe to do so. Contractors generally move heavy and bulky items. When employees, who are untrained, move these items themselves, they may be putting themselves at risk of injury.

## Special Equipment

The employer must ensure staff who have had specific OHS equipment purchased for them make arrangements to transfer this equipment to their new accommodation.

## Contractors

When contractors are employed to undertake part of, or the entire, close down or relocation, the Commonwealth has an obligation to contractors,

- when they are on site, and
- over matters over which the agency has control or would usually be expected to have control.

Whatever the circumstances, agencies need to be aware that it is not possible for them to assign, through any contract, their duty of care under the OHS(CE) Act to any contractor.

*(You can find more information on outsourcing in the Comcare Fact Sheet No 15, 'Employers and Contractors', November 1995).*

## 3. Hazards

A hazard is a source or potential source of human injury, ill-health or disease.

There is a range of hazards which need to be identified, assessed and controlled before starting the relocation or closure process. These include physical, psychological and social hazards.

### Physical Hazards

Physical hazards are perhaps the most readily identifiable and will increase during a relocation or closure process. These hazards are numerous and include:

- clutter from boxes, furniture and trolleys
- obstruction of thoroughfares where corridors and passageways are used as temporary storage areas
- manual handling risks associated with lifting, shifting, packing and moving, and
- cleaning products.

#### Example:

During the packing process the office environment can become cluttered with boxes and additional waste disposal bins. It is important to ensure there are designated areas for these items so that they are easily accessible (to reduce manual handling hazards) but **do not** obstruct traffic flow or emergency exits and fire fighting equipment.

### Social or Psychological Hazards

Social and psychological matters, while less obvious, need to be taken into account as well. Employees may be dealing with losing their jobs, being relocated or coping with the organisational and personal change if they are remaining.

The impact of a closure will vary depending on the individual and their circumstances. An agency can support its employees through the process in many ways, for example:

- ensuring lines of communication are open
- ensuring there are consultative mechanisms in place
- recognising and addressing staff uncertainty, and
- creating an atmosphere of support in the workplace

- acknowledgement/celebration of achievements/milestones.

An agency can also provide practical assistance where appropriate, such as:

- funding training in job interview skills/resume writing, and
- relocation assistance.

Also as part of managing the change processes an agency might consider building in specific career transition arrangements in their certified agreement if closure and redundancies are expected.

When employees are provided with information and support, and feel a part of the change process, morale and productivity are less likely to be negatively affected.

**Suggestion:**

Comcare has produced two publications on the management of stress in Commonwealth agencies:

- *“Implementing an Occupational Stress Prevention Program”*
- *“A Joint ANAO/Comcare Better Practice Guide for Senior Managers”*

also a number of publications on stress related issues in Commonwealth agencies:

- *“Guidelines for the Prevention and Management of Client Aggression, Quality of Working Life Strategy”*
- *“Supervisor’s Handbook: Managing Staff with Stress Response, Quality of Working Life Strategy”*
- *“Developing an Action Plan to Improve Health and Productivity, Quality of Working Life Strategy”*

These booklets discuss a systems approach to the management of stress and are valuable source material for managers.

## 4. Hazard Management

Hazard management aims to reduce the risk of injuries and illness associated with work. It is a systematic, sequential process for making an environment as safe as possible.

The steps in the process are:

### 1. Identify the hazard

- determine what has the potential to cause injury or illness.

### 2. Assess the risk

- what is the likelihood that the hazard will cause injury or illness and what is the consequence if it does.

### 3. Control the risk

- where a risk to health and safety has been identified, controls must be introduced to eliminate or minimise it.

### 4. Monitor and Evaluate

- ensure the control measures are effective.

The following is an example of how the process can be applied to a particular risk in a relocation process:

Step	Example
Identify the Hazard	Moving archive boxes.
Assess the Risk	Determine the likely weight of the boxes and how many there are to move.
Control the Risk	Hire or borrow a trolley suitable to the task.
Monitor and Review the Hazard	On a regular basis review the number of archive boxes that are being moved and aim to minimise double handling. Ensure that the type of trolley acquired is the right one for the job and that it is resolving all the manual handling risks involved.
Evaluate the Controls	Determine whether the trolley will be available whenever the boxes need to be moved, that staff are aware of safe loading and handling precautions and that it is the most appropriate way to do the job.

## Common Hazards and Examples of Control Measures

The following table provides some examples of control measures for common hazards identified in a relocation or closure process.

<b>Physical Hazards</b>	<b>Control measures</b>
Bending/stretching while packing/unpacking	<ul style="list-style-type: none"> <li>• get rid of anything excess to requirements prior to the move</li> <li>• use surfaces when packing/unpacking which eliminate the need to bend, i.e. tables and desks</li> <li>• ensure appropriate aids, e.g. step ladder to reach items above shoulder height</li> <li>• ensure adequate storage space at the new location which enables storage between knee and shoulder heights, and</li> <li>• provide training for relevant staff.</li> </ul>
Lifting or moving boxes / equipment/furniture	Allocating adequate resources to pay for professional removalists where appropriate.
Exposure to dust	<ul style="list-style-type: none"> <li>• Arrange monitoring of the area. If dust is an issue, ensure quality cleaning</li> <li>• ensure staff, particularly those with respiratory complaints, are not exposed, and</li> <li>• provide dust coats, gloves as appropriate.</li> </ul>
<b>Psychological Factors</b>	<b>Control measures</b>
No control over move	Consultation, communication, access to an Employee Assistance Program.
Loss of job/financial independence	As above. Implement transition program including application/interview skills, financial and vocational advice.
Loss of networks	Consultation, communication, access to EAP.
Moving from comfort zone	As above.

Inability to perform core functions	<p>in consultation, assess what functions can be left until stability is resumed, or dropped entirely</p> <p>maintain adequate staffing levels</p> <p>communicate changes to clients</p> <p>agency to provide training, leadership and support, and</p> <p>arrange for mail and phone redirection.</p>
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## Appointing a Coordinator

To assist in the process of hazard management and to plan and oversee the entire close down/relocation process, it is recommended that management nominate a Close Down Coordinator. This person will also:

- ensure communication channels are open and effective
- be available until the close down date
- be contactable to address any further issues that arise, and
- finalise the close down/relocation.

## Undertake a Hazard Audit

The principal action in managing the hazards of the closure or relocation is to undertake a hazard audit. A hazard audit is a formal examination and documentation of the hazards identified and the control measures selected. A small team of suitable staff should undertake the hazard audit. For example, a hazard audit team could consist of:

- the Health and Safety Representative
- the Close Down Coordinator, and
- the person who will be managing any contract removalists.

The Hazard Audit should document the following:

- The nature of the hazard:
  - locality and timing – where and when it could occur, and
  - the hazard details.
- Hazard Control:
  - proposed remedial action
  - responsibilities, and
  - date for completion.

An example of a Hazard Audit is included as Appendix 1

## Loss of designated personnel

There are a number of components to an effective OHS management system. One important component to be monitored in the closure/relocation process is the management of emergency and first aid procedures and reporting of accident/incident information. In a staged closure/relocation of an office it is important to monitor and manage the loss of staff with particular responsibilities. Consideration will need to be given to training and the reassigning of roles such as:

- Health and Safety Representative
- First aid officer
- Fire and emergency wardens, and
- Coordination of :
  - accident and incident reporting
  - workers' compensation, and
  - employee assistance services (EAP).

### **Suggestion:**

Consider whether essential services such as provision of first aid facilities, fire wardens etc. will be compromised during the project. Implement alternative arrangements where appropriate.

## Communication

Implicit in the occupational health and safety legislation is the concept of communication and consultation. The OHS(CE) Act allows for the setting up of Health and Safety Committees and electing or selecting Health and Safety Representatives (HSR) to represent a Designated Work Group on health and safety issues.

The need to consult and inform is paramount when significant changes are being made within a workplace. Staff need to be kept up to date and be provided with a forum for the consultative process. Where the issues relate to health and safety, this is the employer's responsibility. In addition, managers and supervisors are also required to consult with HSRs when requested, on the implementation of changes at the workplace – when these changes may affect the health and safety of the members of the representative's designated work group.<sup>1</sup>

<sup>1</sup> Occupational Health and Safety (Commonwealth Employment) Act 1991: paragraph 30(1)(a)

**Suggestion:**

Ensure appropriate consultative mechanisms are in place. This will enable effective cooperation between the employer and employees during the relocation/closure process. It will allow another avenue of communication and enable concerns to be identified and dealt with early.

A communication strategy for each phase of the relocation or shut down needs to be developed. Employees should be involved in developing the strategy. The health and safety representatives may also provide useful input.

There will be a range of issues which need to be considered in a staged closure. There is the potential for increased pressure to be put on staff who are remaining. The extent and length of this needs to be monitored. Where there are decreasing numbers of staff to perform the functions of the agency, issues to be considered include:

- any changes to service provision
- the adequacy of the resources to undertake the task, and
- training of staff in new roles where there is reallocation of tasks.

**Suggestion:**

Develop a communication strategy covering all parties.

## Checklists

There are a number of checklists available to assist the Coordinator, managers/supervisors and employees to make the relocation/closure process as smooth and effective as possible. Different types of checklists may include:

- a checklist to ensure that the OHS management system maintains the systems integral to safe relocation or shutting down
- manual handling checklists which may be used to identify any issues prior to work commencing. Reference should be made to the Manual Handling Regulations and Code of Practice.<sup>2</sup>
- customer service issues checklists to ensure that core activities can continue with minimum disruption

<sup>2</sup> Manual Handling Reducing Injuries is a Comcare publication available from OHS sections in Comcare Customer Service Centres and Claims Management Centres.

- an environmental checklist which would be used regularly during the move/shutdown to ensure conditions remain safe, particularly for employees and contractors still at the workplace<sup>3</sup>, and
- checklists for specific tasks that prompt employees to act in a safe manner.

Some example checklists have been provided:

Appendix 2 - Considering OHS in office closure - A checklist of reminders

Appendix 3- The DOs and DON'Ts

Appendix 4 –The Corporate OHS Checklist – how to downsize safely

Please note these lists are not exhaustive and you may wish to tailor them to your own working environment.

<sup>3</sup> Reference should be made to relevant Codes of Practice, such as air quality and lighting, and any local policies, for example, on security and client aggression as long as employees remain.

# Appendix 1

## Example of Hazard Audit – Office Closure

HAZARD IDENTIFICATION			HAZARD CONTROL		
No	Locality	Hazard Details	Remedial Action	Responsible	Date Completion
1	Library – Level 13	<ul style="list-style-type: none"> <li>• manual handling – moving existing library books - culling existing stock and destruction of old stock</li> </ul>	<ul style="list-style-type: none"> <li>• manual handling training</li> <li>• provide disposal bins</li> <li>• contractor to undertake heavy lifting</li> </ul>	<ul style="list-style-type: none"> <li>• corporate services - individual area staff</li> <li>• contractor</li> </ul>	<ul style="list-style-type: none"> <li>• 1/6/98 - ergonomist</li> <li>• on days of rubbish removal</li> </ul>
2	Office Area – Level 13	<ul style="list-style-type: none"> <li>• manual handling – packing and dispatch of files</li> </ul>	<ul style="list-style-type: none"> <li>• manual handling training</li> <li>• adjustable sorting table</li> </ul>	<ul style="list-style-type: none"> <li>• corporate services</li> <li>• corporate services</li> </ul>	<ul style="list-style-type: none"> <li>• 1/6/98 - ergonomist</li> <li>• just prior to packing requirements in mid July 1998 – in consultation with ergonomist</li> </ul>
3	Office Area – Level 13	<ul style="list-style-type: none"> <li>• manual handling - wheelie bins required for waste paper, cardboard and plastic materials</li> </ul>	<ul style="list-style-type: none"> <li>• manual handling training as above</li> <li>• restriction of weight</li> <li>• contractor to move disposal bins off the floor</li> </ul>	<ul style="list-style-type: none"> <li>• corporate services</li> <li>• all staff</li> <li>• contractor</li> </ul>	<ul style="list-style-type: none"> <li>• 1/6/98 – ergonomist</li> <li>• as required</li> <li>• days of removal</li> </ul>
4	Office Area – Level 13	<ul style="list-style-type: none"> <li>• manual handling – removal of files from compactus</li> </ul>	<ul style="list-style-type: none"> <li>• manual handling training</li> </ul>	<ul style="list-style-type: none"> <li>• corporate services</li> </ul>	<ul style="list-style-type: none"> <li>• 1/6/98 – ergonomist</li> </ul>
5	Office Areas – Level 12 and 13	<ul style="list-style-type: none"> <li>• security – access &amp; egress</li> </ul>	<ul style="list-style-type: none"> <li>• reminder to all staff regarding security of personal items during entry by contractors, and to guard against theft</li> </ul>	<ul style="list-style-type: none"> <li>• close down coordinator</li> </ul>	<ul style="list-style-type: none"> <li>• ASAP – email advice</li> </ul>

6	Office Area - Level 13	<ul style="list-style-type: none"> <li>• staff stress in relation to office closure and re-organisation</li> </ul>	<ul style="list-style-type: none"> <li>• fullest possible consultative process</li> <li>• availability of EAP services</li> <li>• workshop by consultant trainer</li> </ul>	<ul style="list-style-type: none"> <li>• CEO &amp; office manager all staff consultant</li> </ul>	<ul style="list-style-type: none"> <li>• as required as required 21/4/98</li> </ul>
7	Office Area – Level 13	<ul style="list-style-type: none"> <li>• insufficient staff to maintain core business during office closure, and satisfy closure requirements</li> </ul>	<ul style="list-style-type: none"> <li>• short term assistance to be provided by temporary staff</li> <li>• review of tasks and procedures to ensure high priority tasks are completed</li> </ul>	<ul style="list-style-type: none"> <li>• close down coordinator</li> </ul>	<ul style="list-style-type: none"> <li>• as required</li> </ul>
8	Office Areas – Levels 12 and 13	<ul style="list-style-type: none"> <li>• air-conditioning temperature fluctuations as staff leave the office</li> </ul>	<ul style="list-style-type: none"> <li>• contact building manager to arrange adjustments</li> </ul>	<ul style="list-style-type: none"> <li>• close down coordinator&amp; committee</li> </ul>	<ul style="list-style-type: none"> <li>• as required</li> </ul>
9	Office Area – Level 13	<ul style="list-style-type: none"> <li>• hazardous substances for use in computer printers and photocopier machine</li> <li>• packing these substances for removal</li> </ul>	<ul style="list-style-type: none"> <li>• ensure contractors comply with advisory standards when packing items for removal</li> </ul>	<ul style="list-style-type: none"> <li>• close down coordinator&amp; committee</li> </ul>	<ul style="list-style-type: none"> <li>• as required</li> </ul>
10	Office Areas – Level 12 and 13	<ul style="list-style-type: none"> <li>• housekeeping, access and egress for contractors during packing and removal</li> </ul>	<ul style="list-style-type: none"> <li>• routine visual audit of office area clearance of passages and entrances/exits</li> </ul>	<ul style="list-style-type: none"> <li>• close down coordinator contractors</li> </ul>	<ul style="list-style-type: none"> <li>• as required during removal and closure process</li> </ul>

## Appendix 2

### Considering OHS in Office Closure - A checklist of Reminders

OHS Management Systems	Yes	No	Action required
All staff aware of their OHS responsibilities under the OHS(CE) Act.			
Hazard audit performed and suitable control measures put into place.			
Staff aware of need to complete incident reports should an accident or injury occur and how to do it.			
First aid services are provided for when the current first aid officer is no longer in the office.			
Emergency procedures maintained and displayed.			
The role of the health and safety representative is maintained.			

Manual Handling issues	Yes	No	Action required
Staff informed they are not to lift or move furniture/equipment which contractors have been employed to remove			
“At risk” staff who should not undertake identified manual handling tasks have low risk duties provided			
All necessary equipment obtained/ordered			
• flat bed trolleys,			
• adequate numbers of recycle bins,			
• step ladders,			
• archiving boxes and labels, and			
• protective equipment.			
Appropriate training/instruction provided to all relevant staff.			

<b>Service Issues</b>	<b>Yes</b>	<b>No</b>	<b>Action required</b>
Security arrangements following closure confirmed.			
Mail and phones redirected.			
Clients informed of impending changes			
Out-of-hours removal of surplus equipment to minimise disruption to staff/clients.			
Adequate staffing resources organised and a roster and task list developed in consultation with staff.			
<b>Communication Issues</b>	<b>Yes</b>	<b>No</b>	<b>Action required</b>
Adequate notice of timing of furniture removal and equipment given to staff.			
Staff aware of any changes to provision of first aid.			
Staff aware of, and have access to, the Employee Assistance Program.			
Consultation with health and safety representatives has taken place.			
<b>General Environmental Issues</b>	<b>Yes</b>	<b>No</b>	<b>Action required</b>
Assets register obtained to ensure responsibility for correct items.			
Air conditioning and lighting adjusted as areas vacated.			
Client aggression/response procedures maintained and staff aware of them.			
Office access/walkways clear. No boxes, equipment stored in these areas.			
Specific area to store boxes / equipment / furniture /rubbish awaiting collection.			

## Appendix 3

### The DOs and DON'Ts for staff to consider during the clean up:

#### DOs

**DO** start your clean up now:

- take personal items home over the weeks leading up to closure or relocation.

**DO** get rid of what you don't need to take:

- throw it away – *have enough disposal bins ready and close by*, and
- recycle – *organise for small recycling boxes*.

**DO** substitute physical items:

- take/send information in electronic form.

**DO** when packing items:

- think about the weight in each box.
- ensure you have enough trolleys and boxes,
- ensure the old and new areas are uncluttered, tidy and have enough room to move the trolleys, and
- ensure all your equipment/belongings are labelled and have a home in the new location.

**DO** look after yourself:

- know how to lift and move boxes without hurting yourself or others,
- take regular breaks,
- ask for assistance,
- report any accidents or incidents,
- advise the coordinator if you are unable to undertake any particular task, and
- try to ensure that twisting and bending are minimised.

## **DON'Ts**

- ☒ **DON'T** pack too much into one big box,
- ☒ **DON'T** carry boxes/equipment when you should be using a trolley,
- ☒ **DON'T** move equipment that should be moved by others,
- ☒ **DON'T** leave it all until the last minute and a “mad dash”,
- ☒ **DON'T** lift, carry, pull, push or drag any article without thinking “is there a better way of doing this?”
- ☒ **DON'T** be afraid to ask for assistance, i.e., Coordinator & other team members, and
- ☒ **DON'T** ignore manual handling advice.

## Appendix 4

### The Corporate OHS checklist – how to downsize safely

*Source of adapted checklist: Occupational Health Magazine issue No 114 March 1998, “Replace meaningless research with on-the-ground solutions”, Dr. Niki Ellis.*

Activity	Response		
	Yes	No	Comment
<p>1. Does the agency have a written objective stating a commitment to managing change / downsizing / amalgamation / closure in such a way as to minimise adverse consequences to health and well-being of staff?</p> <p>Has this been signed off at the CEO / Board level?</p>			
<p>2. Has a team or other structure been identified as responsible for managing the change / downsizing / amalgamation / closure?</p>			
<p>3. Is the communications strategy structured? This should include:</p> <ul style="list-style-type: none"> <li>• Desired changes in attitude or knowledge in target groups for each initiative defined</li> <li>• Communication strategies planned and developed (based on sound assessment).</li> <li>• Feedback sought on effectiveness of communication strategies.</li> </ul>			
<p>4. Have communication strategies succeeded in explaining the purpose of the change / downsizing / amalgamation / closure?</p>			
<p>5. Have people been asked about their concerns?</p>			

6. Do communication strategies adequately address them?			
7. Do communication strategies acknowledge, in a realistic and empathetic way, potential losses (no false optimism)?			
8. Is information delivered in a timely fashion?			
9. Do communication interventions exist in the agency, work group or between individuals?			
10. Do communication strategies provide for two-way dialogue?			
11. Are communication channels appropriate for target groups, that is, mostly face to face with some written back-up?			
12. Do quality control mechanisms provide for trickle-down face-to-face communications, including written briefing notes and post-communications debriefs?			
13. Are support services offered such as: outplacement and career counselling services, financial planning, skills development, stress management, and personal counselling such as those provided by employee assistance programs.			
14. Have the needs people have for support been identified in the planning for these services?			
15. Do communication interventions at the agency and workgroup level promote the availability of these services?			

16. Do communication interventions at the individual level refer to these services when needed?			
17. Is feedback on the usefulness of these services passed on to target groups concerned?  Are you relocating or closing an office?			

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