



Government of **Western Australia**
Department of **Mines, Industry Regulation and Safety**
Resources Safety

Psychosocial harm audit – guide

Approved: 08 September 2016

1 Adelaide Terrace, East Perth WA 6004
Postal address: Mineral House, 100 Plain Street, East Perth WA 6004
Telephone: (08) 9358 8002
ResourcesSafety@dmirs.wa.gov.au
www.dmirs.wa.gov.au

Table of contents

Introduction 2

1 Site documents..... 4

Introduction

Based on feedback from stakeholders, this document was updated in June 2016 to improve the content. Most changes modify the text of the 'Standard' (for audit points) and some improve the 'Guideline' text.

This guide supersedes the document published in March 2016 under the title *Psychosocial harms audit - guide*.

This audit is designed to cover the standard related to the management of the risks associated with psychosocial harm in the workplace. The term "psychosocial harm" covers any risk that has the potential to negatively impact on the psychological and physical health of mine workers.

The risks and work-related stressors associated with psychosocial harm may arise from a variety of factors including

- personal or organisational factors (e.g. safety culture);
- poor management practices;
- physical work environment;
- poor design of work and job role;
- poor communication, interpersonal relationships;
- lack of support from colleagues and management;
- bullying and harassment;
- excessive or prolonged work pressures;
- violence and/or trauma;
- workers who have sustained physical injuries; and
- fatigue.

Risks to psychological and physical health due to work should be viewed in the same way as other health and safety risk and a commitment to prevention of work-related stressors should be included in an organisation's health and safety policies, procedures and standards. Stressors relating to non-work related factors such as personal financial circumstances, death of a family member, divorce etc. may also influence a workers' mental health. Although it is difficult for an organisation to control these external factors, the organisation's policies and procedures should enable the identification and management of mental concerns and or mental illness whilst in the workplace.

An employer has a duty of care under the *Mines Safety and Inspection Act 1994* (MSIA) to manage risks associated with exposure to hazards arising from work that could result in harm. The duty of the employer is to ensure the health and safety of workers and other people at the workplace so far as is reasonably practicable, including by:

- providing and maintaining a workplace so that workers are not exposed to hazards;
- providing and maintaining safe systems of work;
- consulting with workers and their representatives on work health and safety matters; and
- providing information, training, instruction and supervision so workers can safely perform their work activities.

Workers have a duty to take reasonable care of their own health and safety and to not adversely affect the health and safety of others around them. Workers must comply with reasonable policies and procedures and reasonable instructions about work health and safety matters. This may include working to job descriptions to avoid role conflict or following workplace policies and procedures to prevent bullying behaviour.

Other people at the workplace such as visitors, are required to take reasonable care of their own health and safety and to take care that their actions do not adversely affect the health and safety of other people.

Additional information on psychosocial risks can be found using the links below:

- Safe Work Australia www.safeworkaustralia.gov.au
- Preventing psychological injury under work health and safety laws fact sheet www.safeworkaustralia.gov.au/sites/SWA/about/Publications/Documents/855/Preventing-Psychological-Injury-Under-WHS-Laws.pdf
- Dealing with workplace bullying – a worker's guide www.safeworkaustralia.gov.au/sites/SWA/about/Publications/Documents/828/Workers-Guide-

- [workplace-bullying.pdf](#)
- Western Australian Equal Opportunity Commission www.eoc.wa.gov.au
- Fair Work Ombudsman www.fairwork.gov.au
- Fair Work Commission www.fwc.gov.au
- Workers with Mental Illness: a Practical Guide for Managers Australian Human Rights Commission <https://www.humanrights.gov.au/our-work/disability-rights/publications/2010-workers-mental-illness-practical-guide-managers>
- Psychologically Safe and Healthy Workplaces: Risk Management Approach Toolkit <http://www.commerce.wa.gov.au/sites/default/files/atoms/files/psychologically-healthy-and-safe-workplace-risk-management-toolkit.pdf>
- Guide for preventing and responding to workplace bullying November 2013 www.safeworkaustralia.gov.au/sites/swa/about/publications/documents/827/guide-preventing-responding-workplace-bullying.pdf
- Code of Practice – Violence, aggression and bullying at work www.commerce.wa.gov.au/sites/default/files/atoms/files/code_violence.pdf
- Beyond Blue www.beyondblue.org.au/
- Beyond Blue "Heads Up" <https://www.headsup.org.au/>
- WorkSafe WA www.worksafe.wa.gov.au
- Blueprint for Mental Health and Wellbeing – Chamber of Minerals and Energy of Western Australia <https://www.cmewa.com/images/files/policy/people-and-communities/Mental-Health-Blueprint.pdf>
- Guide for Managing the Risk of Fatigue at Work www.safeworkaustralia.gov.au/sites/SWA/about/Publications/Documents/825/Managing-the-risk-of-fatigue.pdf
- Working hours – code of practice <https://www.commerce.wa.gov.au/publications/code-practice-working-hours>
- Alcohol and other Drugs at the workplace – guidance note www.commerce.wa.gov.au/sites/default/files/atoms/files/alcohol_and_drugs_0.pdf
- Dealing with Workplace Bullying – A Worker's Guide www.safeworkaustralia.gov.au/sites/SWA/about/Publications/Documents/828/Workers-Guide-workplace-bullying.pdf
- WorkSafe WA Toolkits and information resources – bullying www.commerce.wa.gov.au/worksafe/toolkits-and-information-resources-bullying
- Department of Commerce Guidance Note – Working Alone www.commerce.wa.gov.au/sites/default/files/atoms/files/working_alone.pdf
- Australian Human Rights Commission – 2010 Workers with Mental Illness: a Practical Guide for Managers www.humanrights.gov.au/sites/default/files/document/publication/workers_mental_illness_guide_0.pdf
- Mental Health Commission <http://www.mentalhealth.wa.gov.au/Homepage.aspx>
- Comcare <http://www.comcare.gov.au>
- Gender and Safety in mining - workshop planner series www.dmp.wa.gov.au/Safety/Is-there-a-relationship-between-5093.aspx

1 Site documents

Site documents

Point	Standard	Guideline
1.1	The organisation has written policies that include mental health	<p>Intent:</p> <p>To verify that approved policies, standards and/or procedures outline and define mental health and potential mental health hazards.</p> <p>Personnel:</p> <p>Senior managers, HR manager, line managers, safety and health personnel and workers.</p> <p>Method:</p> <p>Check that there is an approved policy document or equivalent in place which indicates that there are methods for preventing and detecting signs of mental illness. Some flexibility is allowable on the title of the organisation's documentation, i.e. the policy document is not required to be titled 'mental health policy'. A document map is suggested (although not mandatory) if mental health information is spread across various policies, standards, procedures and documents for the organisation.</p>
1.2	Psychosocial risks are covered in the site hazard or risk register	<p>Intent:</p> <p>To ensure that psychosocial harm and the associated risk factors and work-related stressors have been identified as hazards to workers' physical and mental wellbeing.</p> <p>Personnel:</p> <p>Senior managers, HR manager, line managers, safety and health personnel and workers.</p> <p>Method:</p> <p>Seek documented evidence that there is a formal process in place to identify psychosocial harm risk factors and work-related stressors. Verify that this process is adhered to and psychosocial harm risks have been identified and recorded by the organisation. This may include sighting the hazard/risk register to determine if consideration has been given to both psychological and physical health of workers. Identify if psychosocial hazards are reported as well as physical hazards. Speak to managers, line managers and safety and health personnel to gain an idea of the level of understanding of psychosocial harm. Speak to personnel to determine if they are aware of the risk factors that can be hazardous to their own and others physical and mental wellbeing. Ensure that psychosocial harm can be identified and recognised. Refer to <i>MSIA s. 9</i> <i>Refer to introduction audit detail for further guidance on psychosocial harms risk factors and work-related stressors.</i></p>

1.3	There are processes for identifying and addressing inappropriate gendered behaviours	<p>Intent:</p> <p>To verify that inappropriate behaviours in the workplace related to gender are defined and managed.</p> <p>Personnel:</p> <p>Senior managers, HR manager, line managers, safety and health personnel and workers.</p> <p>Method:</p> <p>Speak with personnel on site about their understanding of inappropriate gendered behaviours. Seek evidence that a system is in place to manage inappropriate gendered behaviours.</p> <p>Refer to <i>Gender and safety in mining – workshop planner series</i></p> <p>www.dmp.wa.gov.au/Safety/Is-there-a-relationship-between-5093.aspx</p>
1.4	There are processes for identifying and addressing working hours and work arrangements	<p>Intent:</p> <p>To ensure that working arrangements and hours worked are defined and managed in a fair and appropriate manner.</p> <p>Personnel:</p> <p>Senior managers, HR manager, line managers, safety and health personnel and workers.</p> <p>Method:</p> <p>Speak with personnel to determine the working arrangements commonly accepted in the workplace. Ensure that work practices match the organisation's policy/procedure and that the working arrangements are in line with the Federal Fair Work legislative requirements e.g. leave provisions, standards for employment and termination processes, working hours and conditions. Ensure that consideration is given to the duration of work shifts, rest breaks, recovery time and travel to and from camp/home.</p>

1.5	There are processes for identifying and addressing fatigue	<p>Intent:</p> <p>To verify that fatigue is clearly defined and that an associated fatigue management plan is in place and utilised when required.</p> <p>Personnel:</p> <p>Senior managers, HR manager, line managers, safety and health personnel and workers.</p> <p>Method:</p> <p>Seek documented evidence that there is a fatigue management plan in place. Measures to manage the risks associated with fatigue will vary from one workplace to the next, depending on the nature of the work, environmental conditions and individual factors. The risks associated with fatigue can be managed by following a systematic process which involves:</p> <ul style="list-style-type: none"> • identifying the factors which may cause fatigue in the workplace • assessing the risk of injury from fatigue • controlling risks by implementing the most effective control measures reasonably practicable in the circumstances • reviewing control measures to ensure they are working as planned. <p>Refer to <i>Guide for Managing the Risk of Fatigue at Work</i> www.safeworkaustralia.gov.au/sites/SWA/about/Publications/Documents/825/Managing-the-risk-of-fatigue.pdf <i>Working hours – code of practice</i> www.commerce.wa.gov.au/publications/code-practice-working-hours</p>
1.6	There are processes for identifying and addressing fitness for work (physical and mental)	<p>Intent:</p> <p>To verify that both mental and physical health are considered when assessing an individual's fitness for work.</p> <p>Personnel:</p> <p>Senior managers, HR manager, line managers, safety and health personnel and workers.</p> <p>Method:</p> <p>Verify that a policy and procedure is in place to manage workers' fitness for work. Determine if the employer and workers are aware that a range of influences could affect performance including fatigue, stress, working conditions and workloads. As such, workplaces should take into account these factors when assessing an individual's fitness for work and the risk of accidents/injury. Refer to <i>MSIA ss. 9 and 10</i></p>

1.7

There are processes for addressing the misuse of alcohol and other drugs

Intent:

To verify that there is a system in place to manage alcohol and other drug related harm.

Personnel:

Senior managers, HR manager, line managers, safety and health personnel and workers.

Method:

Ensure that there are procedures for the management of alcohol and other drugs. Risks that could arise from workers being impaired by alcohol and/or other drugs should be addressed through a systematic risk management process. Liaise with site personnel to identify what systems are in place to manage the risk of drug related harm in the workplace. This may include drug testing, education and Employee Assistance Programme (EAP) support.

Refer to *Guidance Note - Alcohol and other Drugs at the workplace*

www.commerce.wa.gov.au/sites/default/files/atoms/files/alcohol_and_drugs_0.pdf

Refer to *MSIA s. 9*

1.8

There are processes for identifying and addressing bullying, violence and aggression

Intent:

To ensure systems are in place to prevent and respond to workplace bullying, violence and aggression.

Personnel:

Senior managers, HR manager, line managers, safety and health personnel, human resources officers and workers.

Method:

Check there are procedures for addressing workplace bullying. The procedure should describe how the employer will prevent and respond to workplace bullying. Speak with personnel about how well bullying complaints are perceived to be handled, check there is consistency across the organisation and equity in how complaints are handled.

Information on your workplace bullying policy may also be provided in:

- induction information, awareness sessions, in-house newsletters and displayed on notice boards
- documents such as a 'code of conduct'
- discussions at staff meetings and in team briefings.

Refer to *Dealing with Workplace Bullying – A Worker's Guide*

www.safeworkaustralia.gov.au/sites/SWA/about/Publications/Documents/828/Workers-Guide-workplace-bullying.pdf

WorkSafe WA Toolkits and information resources – bullying

www.commerce.wa.gov.au/worksafe/toolkits-and-information-resources-bullying

1.9

There are processes for identifying and addressing working alone and/or in remote or isolated areas

Intent:

To verify that there is documented evidence of an implemented risk management process for persons working alone and/or in remote or isolated areas.

Personnel:

Senior managers, HR manager, line managers, safety and health personnel, human resources officers and workers.

Method:

When considering ways to control the risks for those working alone, the risk management process should involve:

- identifying hazards a worker may be exposed to
- assessing the risks of injury or harm arising from the hazards. This involves considering the chance or likelihood of a hazard occurring and, if it does occur, the extent of any injury or harm
- implementing control measures to eliminate or reduce the risks of injury or harm, and ensure they are monitored and reviewed on an ongoing basis.

As part of establishing a safe working environment, employers must provide adequate information, instruction and training for people who work alone. Refer to *Department of Commerce Guidance Note – Working Alone*

www.commerce.wa.gov.au/sites/default/files/atoms/files/working_alone.pdf

Refer to *MSIA s. 9*

1.10

There are processes for identifying and addressing other mental health risk factors

Intent:

To verify there is a procedure and/or a formal process in place for identifying and addressing other mental health risk factors and work-related stressors. To ensure that protective factors have been considered and health promotion initiatives are in place so workers are aware of, and adhere to, the agreed processes.

Personnel:

Senior managers, HR manager, line managers, safety and health personnel and workers.

Method:

Check that induction packages and other educational resources for employees and contractors include and raise awareness of mental health risk factors and work-related stressors, and how these factors are to be addressed and managed. Sight documented evidence that a procedure or approved process is implemented for identifying and addressing mental health risk factors. This includes identifying factors that will potentially pre-dispose workers to mental health illness such as drug and alcohol abuse. This should be included into the education materials and sessions rolled out the workers.

Strategies that may be in place to identify and manage risk factors and stressors include:

- data analysis of HR related data including sick leave, turnover data, grievances, bullying complaints and OSH issues
- specific education for supervisors and managers on management of work-related stressors
- workforce surveys to measure the organisation's safety culture; and
- workload surveys.

Refer to *Mental Health Commission 2014 - Supporting good mental health in the workplace*

www.mentalhealth.wa.gov.au/Libraries/pdf_docs/supporting_good_mental_health_in_the_workplace_1.sflb.aspx

1.11	The policies and procedures relevant to mental health were developed in consultation with representatives from the workforce	<p>Intent:</p> <p>To ensure that workplace representatives are involved in the development of policies and procedures related to psychosocial harm in the workplace.</p> <p>Personnel:</p> <p>SHReps, safety and health personnel, workforce representatives.</p> <p>Method:</p> <p>Speak to SHReps and/or the appropriate workforce representatives to verify that they have the knowledge and understanding to meaningfully participate in the development of psychosocial harm policies and procedures. Through discussions with these individuals and safety and health personnel, verify that the workforce is being consulted through their representatives during the development of policies and procedures related to psychosocial harms and wellbeing. Refer to <i>MSIA s. 9(1)(c)</i></p>
1.12	The policies and procedures relevant to mental health cover the applicable legislation including Equal Opportunity Act 1984, Industrial Relations Act 1979, Fair Work Act 2009, Criminal Code, Privacy Amendment (Enhancing Privacy Protection) Act 2012 and Privacy Act 1988	<p>Intent:</p> <p>To ensure that the appropriate legislation for psychosocial harm related outcomes is recognised and referred to where applicable.</p> <p>Personnel:</p> <p>Senior managers, HR manager, line managers, safety and health personnel and workers.</p> <p>Method:</p> <p>Verify that consideration has been given to the appropriate legislation when developing and implementing policies and procedures that identify and address the consequences of psychosocial harm. Additional pieces of relevant legislation include the <i>Privacy Amendment (Enhancing Privacy Protection) Act 2012</i> and the <i>Privacy Act 1988</i>. <i>* Note: this legislation is outside the jurisdiction of the MSIA.</i></p>

1.13

The processes include methods for ensuring people are not treated unfairly as a result of a mental health issue or illness

Intent:

To ensure that personnel with mental health concerns or illnesses are treated fairly.

Personnel:

Senior managers, HR manager, line managers, safety and health personnel and workers.

Method:

Seek documented evidence of formalised processes for treating all personnel fairly. Speak to personnel to determine if the documented processes are used as intended and outcomes such as fairness and equity are upheld. Consult relevant HR policies and procedures such as those for recruitment and selection, performance management, development and training opportunities, promotion and exit procedures. Consider processes and procedures for handling complaints such as grievance processes, bullying and harassment investigations, workers compensations claims and all other complaint and investigation processes.

Additional relevant legislation includes the *Equal Opportunity Act 1984 (WA)* and the *Disability Discrimination Act 1992 (Commonwealth)*

1.14

The policies and procedures relevant to mental health allow for alternative working arrangements to be considered while the mental health issue or illness is being addressed

Intent:

To ensure that the organisation considers a range of alternative working arrangements for workers with mental health conditions and/or other illnesses. This may include facilitating access to early intervention or treatment options.

Personnel:

Senior managers, HR manager, line managers, safety and health personnel and workers.

Method:

In order to comply with relevant anti-discrimination legislation it is important that the employer considers reasonable adjustments in the workplace for workers with mental health conditions or illness. Reasonable adjustments can include changes to a job role, which can be made to enable a worker to perform their duties more effectively in the workplace.

Sight documented evidence that the needs of workers are met by considering options such as:

- flexible working arrangements (e.g. job rotation, job sharing, variable start and finish times);
- changing some aspects of the job or work tasks (e.g. exchanging a single demanding project for a job consisting of a number of smaller tasks);
- changing the workplace or work area (e.g. moving a worker to a quieter work area); and
- purchasing or modifying equipment.

Reasonable adjustments apply to all areas of employment and the employment process including:

- recruitment, selection and appointment;
- current work role;
- career development;
- training; and
- promotion, transfers or any other employment benefit.

Refer to *Australian Human Rights Commission – 2010 Workers with Mental Illness: a Practical Guide for Managers*

www.humanrights.gov.au/sites/default/files/document/publication/workers_mental_illness_guide_0.pdf

Additional resources for creating mentally healthy workplaces include:

- *Beyond Blue “Heads Up”*
<https://www.headsup.org.au/>
- Mental Health Commission (WA)
<http://www.mentalhealth.wa.gov.au/Homepage.aspx>
- Comcare <https://www.comcare.gov.au/>

1.15	The procedures detail the responsibilities, resources and training available for maintaining a workplace that supports mental wellbeing	<p>Intent:</p> <p>To verify that appropriate resources have been allocated to the training and support of workers mental health and overall wellbeing.</p> <p>Personnel:</p> <p>Senior managers, HR manager, line managers, safety and health personnel and workers.</p> <p>Method:</p> <p>Seek evidence that resources have been allocated to the implementation of the processes designed to maintain and support a mentally healthy workplace. This includes verifying that appropriate staffing, budget, allocation of time and training have been considered. Speak with personnel to determine the level of awareness of such procedures and processes. Consider provisions the organisation has made for a physically healthy workplace i.e. gym access, sporting programs, health promotion programs etc.</p>
1.16	The policies and procedures relevant to mental health are accessible on site and promoted	<p>Intent:</p> <p>To ensure that personnel on site are aware of the sites approved policies, standards and/or procedures relating to mental health and know how to access services, support and where to locate the related procedures.</p> <p>Personnel:</p> <p>Senior managers, HR manager, line managers, safety and health personnel and workers.</p> <p>Method:</p> <p>Check notice boards (including online systems or noticeboards) or any other area where information is communicated to the workforce. Verify that policies and procedures relevant to mental health are readily accessible to all employees and are promoted. This may include digital copies of policies, standards and/or procedures relating to the management of mental health and wellbeing providing workers have easy access to online systems where these are stored.</p>

1.17	Training provided to support the site's mental health strategy including training for supervisors and managers	<p>Intent:</p> <p>To ensure that personnel including managers and supervisors are trained in and understand the site's mental health strategy and associated policies, standards and/or procedures.</p> <p>Personnel:</p> <p>Senior managers, HR manager, line managers, safety and health personnel and workers.</p> <p>Method:</p> <p>Seek documented evidence that training is provided to senior managers, line managers, safety and health personnel and workers on the implementation of the sites mental health strategy. Verify that recorded evidence of training attendance is kept by the organisation.</p>
1.18	Actions that support the mental wellbeing of the workforce are identified and promoted on site	<p>Intent:</p> <p>To verify that actions that support the mental wellbeing of the workforce can be easily identified all personnel and that the supportive behaviours are promoted on site.</p> <p>Personnel:</p> <p>Senior managers, HR manager, line managers, safety and health personnel and workers.</p> <p>Method:</p> <p>Ensure that personnel on site are able to recognise actions that support mental health and wellbeing for themselves and others. Seek documented evidence that these actions are clearly defined and promoted on site. This could include consulting safety and health meeting minutes, promotional and education material displayed and available on site etc.</p>

1.19	There is an Employee Assistance Programme (EAP) in place and it is promoted and used by workers	<p>Intent:</p> <p>To ensure there is an EAP in place that is free, confidential and addresses work and non-work related issues.</p> <p>Personnel:</p> <p>Senior managers, HR manager, line managers, safety and health personnel, workers and human resource officers.</p> <p>Method:</p> <p>Sight evidence that there is an EAP in place and that it is promoted by the organisation and used by workers. Determine if the EAP reporting process is confidential and maintains the privacy of individuals involved. Speak to personnel to identify the culture of help-seeking and whether the EAP is valued.</p> <p>External consultants (e.g. counsellors and/or psychologists) are commonly provided by workplaces to support workers undergoing work and personal difficulties, particularly after stressful events including a fatality, injury or serious occurrence. Some workplaces offer a limited number of sessions with the EAP provider with the opportunity for further sessions if required.</p>
1.20	Actions that do not support the mental wellbeing of the workforce are identified on site as being unacceptable and are addressed	<p>Intent:</p> <p>To ensure that actions that do not support the mental health and wellbeing of the workforce are clearly defined and that there is evidence of a procedure or process in place to address these actions.</p> <p>Personnel:</p> <p>Senior managers, HR manager, line managers, safety and health personnel, workers, human resource officers and SHReps/workforce representatives.</p> <p>Method:</p> <p>Speak to supervisors, workers and SHReps/workforce representatives to verify that inappropriate actions including unacceptable behaviours that may affect mental wellbeing are defined and understood by the workforce. Assess the suitability of the tools available to management to deal with such actions. Look for consistency and equity in processes, approach and application.</p>

1.21

The policies and procedures relevant to mental health are updated regularly, with input from representatives from the workforce

Intent:

To ensure there is a review and monitoring process in place for mental health related strategies, policies, procedures and standards.

Personnel:

Senior managers, HR manager, line managers, safety and health personnel and SHReps/workforce representatives.

Method:

Verify that there are review dates on all mental health related policies, procedures and standard documentation. Ensure that the content is reviewed on a regular basis according to the review dates to confirm the most relevant and up-to-date information is being referred to. Liaise with representatives of the workforce to determine if they are involved and have opportunities to contribute to the “develop and review” process.

Refer to MSIA s. 9(1)(c)