NOPSEMA
Australia's offshore energy regulator

GUIDANCE NOTE

Psychosocial risk management in the Offshore Energy industry

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Core concepts

- The Commonwealth *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGS Act) stipulates that operators of facilities and certain other duty holders must provide members of the workforce with a working environment that is safe and without risk to health.
- Psychosocial hazards can compromise the psychological and physical health of members of the workforce, as well as contribute to accidents and dangerous occurrences.
- The Commonwealth Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2024 (Safety Regulations) require that facility operators describe how sexual harassment, bullying and harassment, which are recognised psychosocial hazards, will be prevented and reported to NOPSEMA and how the operator will comply with relevant legislation relating to sexual harassment, bullying and harassment.
- Psychosocial hazards can only be effectively controlled using a risk management approach in which duty holders proactively identify hazards, assess the risk of harm, implement targeted control measures and review these controls to determine their effectiveness. Consultation with workers and Health and Safety Representatives (HSRs) is required throughout the risk management process.
- This guidance has been developed to assist duty holders in meeting their obligations under the OPGGS Act and Safety Regulations.

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Definitions

Accident	An occurrence at or near a facility resulting in the death or serious injury of any individual, or which causes a member of the workforce to be incapacitated from performing work for 3 or more days [OPGGS Act Schedule 3 Clause 82(1)(a); Safety Regulations 2.41(1)].
Duty holder	For the purpose of this guidance note a duty holder includes an operator of a facility, a person who is in control of any part of a facility or of any particular work carried out at a facility, and an employer.
Health	Physical and psychological health of a person.
Psychosocial hazard	Hazards arising from or related to the design or management of work, the working environment, plant at a workplace, or workplace interactions or behaviours which may cause psychological and physical harm.
Psychosocial risk	The risk to the health and safety of a worker or other person arising from a psychosocial hazard.

1. Introduction

This document provides guidance on psychosocial risk management in the context of the Commonwealth OPGGS Act 2026 and OPGGS Safety Regulations 2024. Due to the unique work and living conditions experienced in the offshore petroleum industry, members of the workforce may be at an increased risk of exposure to psychosocial hazards. Exposure to psychosocial hazards can cause harm to health and contribute to accidents and dangerous occurrences.

The OPGGS Act defines health as including psychological and physical health. Duty holders must therefore take all reasonably practicable steps to eliminate psychosocial risks and if that is not reasonably practicable then minimise these risks to a level that is as low as reasonably practicable (ALARP), consistent with the management of all other hazards.

The purpose of this guidance note is to provide duty holders with information on how to manage psychosocial risk in the workplace, thereby facilitating compliance with their legislative obligations. Specifically, this guidance note outlines the relevant legislative requirements of the duty holder, provides information on psychosocial hazards, and offers guidance on how to implement control measures to effectively demonstrate a reduction of psychosocial risk to a level that is ALARP.

These guidelines reference mandatory actions directly referring to legislative requirements. They also include examples of possible/potential approaches and strategies, which are not prescriptive.

2. Legislative requirements

OPGGS Act 2006 – Duties relating to occupational health and safety

Cl. 9(1) The operator of a facility must take all reasonably practicable steps to ensure that:
(a) the facility is safe and without risk to the health* of any person at or near the facility; and
(b) all work and other activities carried out on the facility are carried out in a manner that is safe and without risk to the health* of any person at or near the facility.

**Note that "health" is defined as physical and psychological health in Schedule 3, Clause 4(1).*

Cl. 9(2) The operator of the facility is taken to be subject, under subclause (1), to each of the following requirements:
(d) to take all reasonably practicable steps to implement and maintain systems of work at the facility that are safe and without risk to health.

Cl. 10(1) A person who is in control of any part of a facility, or of any particular work carried out at a facility, must take all reasonably practicable steps to ensure that:
(a) that part of the facility, or the place where that work is carried out, is safe and without risk to health; and
(b) if the person is in control of particular work – the work is carried out in a manner that is safe and without risk to health.

Cl. 10(2) A person who is in control of any part of a facility, or of any particular work carried out at a facility, is taken to be subject, under subclause (1), to each of the following requirements:
(c) to take all reasonably practicable steps to implement and maintain systems of work at that part of the facility, or in carrying out work at that place, that are safe and without risk to health.

Cl. 11(1) An employer must take all reasonably practicable steps to protect the health and safety of employees at a facility.

Cl. 11(2) An employer is taken to be subject, under subclause (1), to each of the following requirements:
(c) to take all reasonably practicable steps to implement and maintain systems of work that are safe and without risk to health.

The OPGGS Act requires that operators and persons in control of part of a facility must take all reasonably practicable steps to ensure that the facility and the activities carried out on the facility are safe and without risk to health and to implement and maintain systems of work that are safe and without risk to health. As the OPGGS Act defines health as both physical and psychological, duty holders are required to manage psychosocial hazards so that the risk of harm is ALARP.

Harmful workplace behaviours such as bullying and harassment are examples of psychosocial hazards. The OPGGS(S) Regulations includes additional requirements for prevention and management of these behaviours as well as reporting of bullying and harassment incidents to NOPSEMA; as outlined below.

OPGGS Safety Regulations 2024 – Sexual harassment, bullying and harassment

R.2.15A The safety case for a facility must describe the measures the operator of the facility has, or will, put in place to:

(a) prevent sexual harassment, bullying and harassment at the facility; and

(b) comply with relevant legislation* relating to sexual harassment, bullying and harassment; and

(c) report incidents of sexual harassment, bullying and harassment at the facility to NOPSEMA.

*the Fair Work Act 2009, Sex Discrimination Act 1984 & state & territory legislation

R.2.46B

(1) The operator of a facility must give NOPSEMA a written notice if they become aware that any of the following has occurred at the facility

(a) an incident of sexual harassment

(b) an incident of bullying

(c) an incident of harassment

(2) The notice must be given to NOPSEMA as soon as practicable after the operator becomes aware of the incident and must include a de-identified account of the incident

(3) The operator must, within 30 days after notifying NOPSEMA of an incident under subsection (1) give a written report to NOPSEMA about the incident (which includes) the following:

(a) a de - identified account of the incident;

(b) details of the action taken, or proposed to be taken, to deal with the incident;

(c) details of measures that have been, or will be, put in place at the facility to prevent or lessen similar incidents occurring at the facility.

OPGGS Safety Regulations 2024– Contents of a safety case

R2.5(4) The safety case for a facility must also contain a detailed description of the safety management system that:

(a) is comprehensive and integrated; and

(b) provides for all activities that will, or are likely to, take place at, or in connection with, the facility; and

(c) provides for the continual and systematic identification of hazards to health and safety of persons at or near the facility; and

(d) provides for the continual and systematic assessment of:

(i) the likelihood of the occurrence, during normal or emergency situations, of injury or occupational illness associated with those hazards; and

(ii) the likely nature of such injury or occupational illness; and

(e) provides for the reduction to a level that is as low as reasonably practicable of risks to health and safety of persons at or near the facility including, but not limited to:

(i) risks arising during evacuation, escape and rescue in case of emergency; and

(ii) risks arising from equipment and hardware; and

(f) provides for inspection, testing and maintenance of the equipment and hardware that are the physical control measures for those risks

2.1 Safety Case submissions in relation to psychosocial hazards

The OPGGS Act defines health as both physical and psychological, therefore psychosocial hazards which can impact worker mental health should be addressed in the safety management system as per Regulation 2.5(4). This means the safety case for a facility must outline how psychosocial hazards are identified, assessed and controlled to a level that is ALARP.

The additional OPGGS(S) Regulations which address sexual harassment, bullying and harassment require operators to provide further detail on the measures in place to prevent these behaviours at a facility; comply with legislation relating to sexual harassment, bullying and harassment; and report these types of incidents to NOPSEMA in the facility safety case. Further detail on safety case submissions in relation to sexual harassment is available in the NOPSEMA guidance note *Preventing sexual harassment in the offshore energy industry*.

2.2 Reporting psychosocial incidents to NOPSEMA

Operators are required to give NOPSEMA a written notice if they become aware of any incident of sexual harassment, bullying or harassment at a facility. This notification must include a de-identified account of the incident. To share details without identifying the parties involved, terminology such as “affected worker(s)” can be used for those experiencing the behaviour and “subject(s)” for those accused of the behaviour being reported. These initial reports to NOPSEMA should describe as much information as is available on the context of the incident(s) including when and where the behaviours occurred, the working relationship between the parties (e.g. coworkers, manager/subordinate, contract worker/direct employee) and the actions taken to immediately mitigate the risk of further harm to health.

Within 30 days after notifying NOPSEMA of an incident of sexual harassment, bullying or harassment, the operator is required to give a written report to NOPSEMA which provides detail of the action taken, or proposed to be taken to deal with the incident as well as measures to be put in place to prevent or lessen the risk of similar incidents occurring. Operators should notify NOPSEMA if details of proposed actions to prevent recurrence of the incident are not available within 30 days.

Workers may be reluctant to report psychosocial incidents due to concerns about retaliation or breaches of confidentiality. To strengthen the reporting culture on a facility, duty holders should provide all workers with reporting systems which are accessible and protect the confidentiality of workers involved. Operators should share information on the methods implemented to prevent recurrence of reported incidents with HSRs whilst ensuring that sensitive information about the incident is only revealed with the consent of all parties involved.

3. Psychosocial hazards

3.1. What are psychosocial hazards?

Psychosocial hazards are hazards that arise from or in relation to:

- the design or management of work
- the working environment
- plant at a workplace, or
- workplace interactions or behaviours,

and that may cause psychological and physical harm.[1] Some common psychosocial hazards in the offshore energy industry are:

Hazard	Description
High job demands	• Intense or sustained physical or emotional effort required to do a task or job • High vigilance required with limited margin of error or systems to prevent individual error • Unreasonable or excessive time pressures or role overload • Shifts/work hours that do not allow adequate time for sleep and recovery
Low job control	• Limited worker control over aspects of work including how or when a job is done • Prescriptive processes which do not allow workers to apply their skills and judgement • Jobs where the levels of autonomy are not matched to workers' abilities
Fatigue	• Jobs where there are high cognitive demands (such as sustained concentration or extended work hours) • Jobs with long working hours and/or roster cycles without adequate recovery between shifts) • Environmental stressors at work (e.g. light, noise, climate, vibration) or accommodation facilities that compromise the amount and quality of sleep and rest.
Inadequate reward and recognition	• Jobs with low positive feedback or imbalances between effort and recognition • High level of unconstructive negative feedback from managers • Low skills development opportunity or underused skills
Poor organisational justice	• Inconsistent, unfair or inequitable management decisions and application of policies • Lack of procedural fairness in workplace investigations • Unequal access to resources or processes in rosters, recruitment, room allocation, etc.
Job Insecurity	• Employment where workers lack the assurance that their jobs will remain stable from day to day, week to week, or year to year • Work that involves uncertainty on conditions of employment, little or no entitlements or benefits (e.g. sick leave, pay rates)
Lack of role clarity	• Uncertainty over task processes due to inadequate or outdated procedures • Management has conflicting expectations from workers • Role creep/ambiguity over worker responsibilities
Poor change management	• Insufficient consultation, consideration of new hazards or performance impacts when planning for, and implementing, change • Insufficient support, information or training during change

[1] *Model Code of Practice Managing psychosocial hazards at work* published by Safe Work Australia July 2022

Hazard	Description
Poor support	• Inadequate training, tools and resources for workers to complete a task • Lack of support from managers or assistance from colleagues when needed
Exposure to trauma	• Experiencing fear or extreme risks to the health or safety of themselves or others (e.g. near misses to major accidents or events) • Exposure to seriously injured persons or distressing situations • Exposure to distressing or graphic material (photographs, videos, witness statements).
Remote or isolated work	• Working in locations with long travel times, or where access to help, resources or communications is difficult or limited • Work where there are no or few other people around
Poor physical environment	• Exposure to extremes of temperature, excessive noise or unpleasant conditions • Hazardous working environments
Bullying	• Repeated unreasonable behaviour directed towards a worker or group of workers that creates a risk to health and safety[2]
Harassment	• Harmful behaviour that does not amount to bullying (such as single instances) but creates a risk to health or safety • Harassment due to personal characteristics such as age, disability, race, nationality, religion, political affiliation, sex, relationship status, sexual orientation or gender identity
Sexual harassment	• Any unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated or intimidated, where a reasonable person would anticipate that reaction in the circumstances[3]
Conflict or poor workplace relationships and interactions	• Poor workplace relationships or interpersonal conflict between colleagues or from other businesses • Frequent disagreements, disparaging or rude comments, either from one person or multiple people • Workplace with tolerance for incivilities or acceptance of aggressive language, which is not targeted, but creates a hostile environment

3.2. Impacts of psychosocial hazards

3.2.1. Harm to health

Some psychosocial hazards, such as sexual harassment, may cause serious harm directly; while in many cases, a combination of psychosocial hazards interacts to cause harm. Psychological harm or injuries from psychosocial hazards include conditions such as anxiety, depression, post-traumatic stress disorder and

[2] Definition of bullying from Safe Work Australia Guidance and the *Fair Work Act 2009 (Commonwealth).*
[3] *Model Code of Practice: Sexual and gender - based harassment,* published by Safe Work Australia on 20 December 2023

sleep disorders. In some cases, workplace psychosocial hazards could also lead to self-harm and suicidal thoughts. Physical injuries from psychosocial hazards include musculoskeletal disorders, chronic disease and fatigue-related accidents. Persistent, unmanaged exposure to work-related stress can also result in burnout.

Both short- and long-term exposure to psychosocial hazards may cause harm to a person. For example, workers can be exposed to an acute, severe psychosocial hazard such as workplace violence or a traumatic incident at work which impacts health, as well as cumulative low-level exposure to psychosocial hazards which lead to psychological or physical injury. People may experience multiple psychological and physical symptoms of harm from exposure to psychosocial hazards, and these effects can be delayed and/or ongoing.

The likelihood or severity of harm to workers will vary due to individual differences, experience in the workplace and context. As a result, some workers may be at greater risk of harm from psychosocial hazards including young workers, culturally and linguistically diverse populations and those experiencing perceived barriers to raising safety issues due to power imbalance or previous experiences.

3.2.2. Impacts on human performance

In addition to adverse health outcomes for workers, exposure to psychosocial hazards and risk factors in the workplace can also affect performance and increase the risk of accidents or incidents. A worker's reaction time, decision-making, situational awareness and quality of work output can all be negatively impacted in periods of psychological distress, and therefore exposure to psychosocial hazards can contribute to the risk of accidents due to their impact on human performance. A sample bow tie analysis linking psychosocial hazard exposure to major accidents and events is provided in the Appendix.

4. Psychosocial risk management

Operators, and other relevant duty holders, must take all reasonably practicable steps to eliminate or minimise the risks of harm from psychosocial hazards on or near offshore facilities. The risk management process involves:

- identifying the hazards
- assessing the associated risks
- implementing control measures to eliminate or minimise risks, and
- regularly reviewing control measures to ensure they remain effective.

Workers and HSRs should be consulted at each stage of the psychosocial risk management process, including hazard identification, risk assessment, selection of controls and review of control effectiveness.

By systematically identifying hazards and risks, assessing the risk, implementing controls, and reviewing the efficacy of those controls, organisations are more likely to meet their legislative obligations to reduce risk to ALARP. Commitment and engagement from senior leaders and managers throughout this process is essential, including consideration of who will be involved, the process which will be followed and how outcomes will be recorded and communicated.

Risk management is an ongoing process which should be conducted when there are changes to the workplace, such as an organisational restructure; when workers report psychosocial incidents or HSRs raise

hazards; or when new or emerging risks to the workforce arise. Duty holders should also consider psychosocial hazards at the design phase of a project or task to prevent harm to workers.

Detail on the risk management processes at a facility should be outlined in safety case submissions as per Regulation 2.5(4) in section 2 of this guidance.

4.1. Identifying hazards

Consultation with workers and HSRs is imperative to effective hazard identification. When discussing psychosocial hazards with workers and HSRs, consider the different ways in which workers may describe the risks. For example, they may feel angry about policies being applied unfairly, confused about conflicting priorities or unrealistic expectations, tired from lack of sleep, or frustrated about dealing with an aggressive person.

Psychosocial hazards and risk factors in the workplace may be identified in a variety of ways and requires input from different operational groups and work teams, HSRs, Human Resources (HR) and subject matter experts where practicable. Depending on the size and complexity of the workplace, some ways to identify psychosocial hazards include:

- reviewing organisational structure (e.g. lines of reporting, supervisory responsibilities)
- running focus groups or surveys to help identify circumstances that could impact mental health
- inspecting the design and use of the physical workplace (e.g. use of break-out areas, communication equipment and condition of the work environment) and observing how work tasks are completed
- assessing specific job requirements to ensure workload is reasonable
- reviewing the reporting and investigation processes available and worker trust in these processes
- examining hazard and incident reports to identify common themes or patterns of behaviour
- analysing HR data such as leave utilisation, exit interviews, staff turnover, complaints and injury data, including workers compensation claims
- examining de-identified data from vocational rehabilitation or injury management personnel and employee assistance providers (EAPs)
- reviewing Health and Safety Committee (HSC) meeting records, and previous psychosocial risk assessments and any material feeding into them
- consulting relevant codes of practice and other guidance, including published literature on emerging risks to psychosocial health

4.2. Risk assessment

To assess the risk of harm, you need to consider which workers are affected and the duration, frequency and severity of their exposure to the hazard. Workers and HSRs should be involved in reviewing psychosocial risk assessments, identifying emerging risks and evaluating whether implemented controls are effective.

For a psychosocial risk assessment, the duty holder should determine:

- the seriousness of the risk (considering both the consequences for affected workers and others and the likelihood of harm occurring)
- which workers are most at risk and likely to be affected
- if risks are facility-wide or apply to specific groups of workers or work tasks
- what controls are currently used (if any), and how effective they are
- what controls could reduce the risk(s) to the lowest practical level, and
- the priority for action.

Because psychosocial hazards may interact or combine to affect the level of risk, any assessment of psychosocial risks should consider all the potential hazards workers are exposed to and the cumulative impact of these, rather than as isolated hazards. This is particularly important in the offshore environment where workers live and work in the same location for extended periods and have limited ability to remove themselves from sources of stress.

In assessing the potential risk to worker from psychosocial hazards, information on sensitive issues such as bullying should be de-identified to protect anonymity of workers. It may be helpful to engage subject-matter-experts in psychosocial risk to conduct an assessment, however workers and HSRs must be consulted as part of the risk assessment process.

Operators conducting psychosocial risk assessments should keep records of the process undertaken and the outcomes of the assessment for use in their safety cases.

4.3. Controlling psychosocial hazards

The selection of psychosocial risk control measures must be informed by the outcomes of hazard identification and risk assessment activities. Psychosocial hazards may manifest differently depending on the nature of offshore operations, workforce composition, roster arrangements, organisational structure and stage of the asset life cycle. Accordingly, there is no single set of controls that will be appropriate in all circumstances.

Control measures should be targeted and proportionate to the hazards and risks identified. Where similar hazards exist across multiple facilities or operations, duty holders should verify that controls remain effective and reasonably practicable in each context. Consistent with Australian WHS regulatory guidance, such as the Model Code of Practice: Managing psychosocial hazards at work (Safe Work Australia, 2022), duty holders should give priority to controls that eliminate psychosocial hazards or minimise risks through changes to the design and management of work, the working environment, and organisational systems. Controls that primarily assist workers to cope with exposure, such as training, wellbeing initiatives or support services, should be implemented only as supplementary measures and not relied upon in isolation.

It may not always be reasonably practicable to eliminate a psychosocial hazard or risk; for example, working in offshore oil and gas facilities means workers are inevitably exposed to remote environments and shift work patterns that increase the risk of fatigue or burnout. Where a hazard cannot be eliminated, the operator must minimise the risk to as low as is reasonably practicable. This could involve increasing protective factors such as providing access to Wi-Fi to promote communication with support networks, revising shift rosters and swings to reduce periods of isolation, and increasing worker control over how

work is done. The negative impacts of fly-in fly-out work can also be mitigated by providing comfortable living conditions and recreational facilities.

Because psychosocial hazards arise from the design or management of work, the working environment, plant at a workplace, and workplace interactions or behaviours, controlling these hazards must address these factors.

4.3.1. The design of work

Psychosocial hazards frequently arise from the way work is designed, allocated, scheduled and managed offshore. For example, delayed crew changes, vacancies, overtime, campaign work, prolonged swings and cumulative fatigue risks can significantly impact psychosocial risk in offshore operations. Duty holders should give priority to controls that address these systemic factors.

Expected controls may include:

- designing roles, responsibilities and task allocations that are realistic and achievable within rostered hours, including allowance for safety-critical procedures, permit-to-work requirements, handovers and operational contingencies
- ensuring adequate crewing levels to manage both routine operations and foreseeable disruptions without sustained excessive workload
- planning maintenance campaigns, shutdowns and project work to avoid prolonged periods of high job demands or time pressure
- managing fatigue through roster design that provides sufficient opportunity for sleep and recovery, taking account of shift length, night work, rotation patterns and cumulative effects across swings
- providing role clarity, clear decision-making authority and well-defined contractor interfaces to reduce uncertainty and conflicting demands
- ensuring workers are consulted on decisions affecting wellbeing (recreational options, food choices, rosters) as well as how tasks are performed, where safe and practicable to do so.

Controls should be proactive and preventive. Production schedules should be designed to minimise the risk of sustained excessive workloads, and duty holders should avoid reliance on informal overtime, extended shifts or individual coping strategies as a means of managing work demands.

4.3.2. The working environment

The offshore working environment can contribute to psychosocial risk due to isolation, confinement, low autonomy and separation from family and community supports as well as exposure to hazardous physical environments. Duty holders are expected to implement controls that mitigate these environmental stressors.

Effective controls may include:

- provision of reliable communication systems and breakaway spaces that allow regular contact with home and support networks
- roster arrangements that are predictable and support sustainable work–life balance over time

- access to appropriate psychosocial support services that are suitable for offshore and remote deployment
- provision of living and recreational facilities that support rest and recovery and promote social connections
- providing accommodation which maximises privacy and minimises noise as much as possible
- providing core crew with assigned cabins, or giving workers choice over cabin allocation

Environmental controls should recognise that psychosocial impacts may build progressively and may not be immediately apparent. For example, ongoing use of shared rooms with inadequate noise insulation between rooms and the use of bunk beds can contribute to poor sleep quality and lack of privacy, which worsens over time.

4.3.3. Plant at a workplace

The design, condition and use of plant can influence psychosocial risk, particularly in safety-critical offshore environments where high cognitive load, sustained vigilance or exposure to alarms and automation is required

Duty holders should consider controls such as:

- designing and maintaining plant, control systems and human–machine interfaces to reduce excessive cognitive demand, confusion or alarm fatigue
- ensuring plant reliability and maintenance arrangements minimise unplanned disruptions that increase workload and stress
- providing adequate training and competence assurance so workers can interact safely and confidently with complex plant and systems
- involving workers in the design, modification or review of plant and systems where changes may affect workload, situational awareness or role demands.

Psychosocial considerations should be integrated into management of change processes alongside safety and engineering risks.

4.3.4. Workplace interactions or behaviours

Psychosocial hazards may arise from interpersonal interactions, behaviours and workplace culture, particularly in confined offshore environments where workers have limited ability to remove themselves from the workplace.

Duty holders are expected to implement controls that promote respectful, inclusive and psychologically safe interactions, including:

- clearly defining and communicating expected standards of behaviour
- providing accessible and confidential reporting mechanisms suitable for all offshore workers
- ensuring reports of inappropriate behaviour are addressed promptly, fairly and without victimisation
- managing power imbalances, contractor relationships and supervisory practices that may contribute to psychosocial risk

- training offshore leaders and supervisors to model expected standards of behaviour; identify and respond to inappropriate behaviours; and support affected workers.

Controls should ensure workers feel able to raise concerns without fear of repercussions or adverse consequences to their employment such as reduced future offshore opportunities.

4.4. Monitoring and review of controls

Duty holders must monitor and review psychosocial risk controls to verify they remain effective and appropriate to offshore operations. This includes consulting with HSRs to review controls following incidents, workforce or roster changes, operational transitions or emerging risk indicators. Duty holders should monitor leading and lagging indicators such as overtime trends, incident reports, exit interview themes, anonymous psychosocial surveys and medical reports as part of this process.

In addition to reactive monitoring of psychosocial risk control strategies, proactive review of controls should be undertaken at least every five years as per safety case requirements for facilities. Psychosocial risk management should be embedded within existing safety management systems and continually improved over time.

5. Example – Practicable psychosocial risk management

Through consultation with HSRs and workers, the management team at a fixed production facility became aware of increasing levels of psychological distress among the workforces. Workplace data showed a significant uptick in the number of people accessing the EAP, an increase in sick leave utilisation, and workforce surveys noting unfair or unreasonable allocation of work. The HSRs on the facility noted mental health was an issue; specifically, that they had observed patterns of low morale and increased stress in the members of their workgroups.

In response, facility management decided to investigate the possible causes of this issue. In consultation with HSRs, they undertook job observations, conducted focus groups and interviews, and administered a brief survey across the workforce. A further review of HR data revealed increased trends in overtime, reports of fatigue, and psychological injury claims. The results indicated that a large proportion of the workforce were experiencing a high workload; were being assigned tasks that were outside of their usual role and that they did not feel competent to complete; and were frustrated that changes made to processes had not been communicated well. Travel arrangements and accommodation were also identified as contributing to poor sleep.

Facility management engaged with various onshore functions to revise and update the competency and training matrices as well as the workforce planning in relation to new procedures. The work planning processes were adjusted to ensure that tasks were allocated in accordance with the availability of personnel with the necessary qualifications and skills for each task. Frontline supervisors were involved in reviewing the forward plan before it was finalised, to ensure that their team members would be able to complete the tasks detailed within the plan. HSRs liaised with the workforce and management to identify improvements in cabin and bed allocation as well as adjustments in the design and maintenance of cabins to reduce noise and increase privacy.

At the facility, members of the workforce were informed of the actions being taken to improve their workload and were asked for their involvement as a means of providing real-time feedback to the onshore planning team. Data on the overtime was monitored sent back to the planning team to incorporate into

their ongoing improvement process. The management team ran focus groups with members of the workforce to assess whether the work assigned to them was achievable, whether updates made to improve cabin design and allocation had improved sleep quality and their perceptions of management support and communication of change. This data was collated and added to the psychosocial risk register to ensure the identified hazards continued to be monitored and addressed.

6. Resources

There are several publicly available resources that can assist duty holders in developing and maintaining a psychosocial risk management system. A summary of resources is available below.

6.1. National and International Resources

Safe Work Australia Model Code of Practice: Managing psychosocial hazards at work (2022)

Comcare (Commonwealth regulator) Work Health and Safety (Managing Psychosocial Hazards at Work) Code of Practice (2024)

International Standard ISO 45003:2021 – Occupational health and safety management — Psychological health and safety at work — Guidelines for managing psychosocial risks (Edition 1, 2021)

6.2. Jurisdictional codes and regulator tools

New South Wales: *Code of Practice: Managing psychosocial hazards at work* (SafeWork NSW) 2021

Queensland: *Managing the risk of psychosocial hazards at work Code of Practice* (WorkSafe Queensland) 2022

Western Australia: *Code of practice on psychosocial hazards in the workplace* (WorkSafe WA) 2022

South Australia: *Managing Psychosocial Hazards at Work Code of Practice* (SafeWork SA) 2026

Tasmania: *Managing Psychosocial Hazards at Work Code of Practice* (WorkSafe Tasmania) 2023

Northern Territory: *Code of Practice: Managing psychosocial hazards at work* (NT WorkSafe) 2024

ACT: *Managing Psychosocial Hazards at Work Code of Practice* (WorkSafe ACT) 2023

6.3. Research

These public research bodies are frequently referenced by regulators and can support evidence-based decision making, particularly where duty holders need to justify control effectiveness.

International Labour Organization. (2026). *The psychosocial working environment: Global developments and pathways for action*. International Labour Office. https://doi.org/10.54394/00033223

University of South Australia – Psychosocial Safety Climate Global Observatory Psychosocial Safety Climate (PSC) research and tools. Available at https://www.unisa.edu.au/research/pscglo/

University of Queensland – Psychosocial Risk and Safety Management (PRISM) Lab Research on psychosocial hazards, regulation and work design. Available at https://www.psychosocialrisklab.net/

Appendix: Bow tie analysis linking psychosocial hazards to MAE outcomes

