



Workplace Health and Safety:

**GUIDE
FOR THE
DRYCLEANING
INDUSTRY**

Contents

1.	INTRODUCTION	3
	What Is This Guide About?	3
	Who Should Use This Guide?	3
	Aims of the Guide	3
2.	LEGISLATION	4
	What Is the Legislation?	4
	The Workplace Health and Safety Act 1995	4
	Workplace Health and Safety Regulation	5
	Codes of Practice	5
	Penalties and Notices	6
3.	MANAGING HEALTH AND SAFETY	7
	Health and Safety Consultation	7
	Workplace Health and Safety Officers	7
	Health and Safety Policy Statement	8
	Health and Safety Information	9
	Training	9
	Preventive Maintenance of Plant and Equipment	10
	Reporting, Record Keeping and Investigation	11
	Emergency Planning	13
	First Aid	14
	Rehabilitation	14
4.	RISK MANAGEMENT	16
	Risk Management - The Procedure	16
5.	DRYCLEANING HAZARDS	19
	Manual Tasks	19
	Hazardous Substances	23
	Heat Stress	29
	Noise	30
	Boilers	32
	Electricity	34
6.	OTHER WORKPLACE HEALTH AND SAFETY ISSUES	36
	Slips, trips and falls	36
	Cooling towers	37
	Burns	37
	Lighting	38
	APPENDIX 1: Example of a Health and Safety Policy	39
	APPENDIX 2: Hazardous Substances Register	40
	APPENDIX 3: Hazardous Substances Risk Assessment	41
	APPENDIX 4: Hazardous Substances Training Record	43
	APPENDIX 5: Employee Acknowledgement	44

1. INTRODUCTION

What Is This Guide About?

There are many hazards at drycleaning workplaces that may result in illness or injury. The number and severity of illness and injuries will be reduced by informing and making people aware of the hazards and by taking reasonable and practical precautions.

To this end, the guide provides guidance on:

- causes of injury and disease at drycleaning workplaces;
- safe work practices;
- precautions to be taken;
- ways to develop healthier and safer systems of work; and
- requirements for compliance with workplace health and safety legislation

Who Should Use This Guide?

This guide is primarily for employers and operators in the drycleaning industry. Drycleaning operations provide an important community service by undertaking cleaning of clothing and furnishings for households and commercial organisations.

While the guide is useful to large drycleaning operations, it has particular relevance to small businesses in the industry.

Employees may find this guide useful as well. It helps employers and employees meet this responsibility to ensure a healthy and safe workplace by outlining:

- legislative responsibilities;
- risks typically experienced at drycleaning workplaces;
- safe work practices.

Aims of the guide

The guide aims to:

- raise awareness about health and safety issues;
- help identify health and safety hazards;
- offer solutions and advice;
- aid consultation;
- inform and help.

2. Legislation

What is the legislation?

Health and safety legislation has 3 parts. These are:

- The Workplace Health and Safety Act 1995 [the Act];
- The Workplace Health and Safety Regulation 1997; and
- Codes of Practice.

The Workplace Health and Safety Act, Regulation and Codes of Practice provide a framework for the management of health and safety within which those involved in the workplace must operate. The legislation provides for flexibility in the management of risks within your work environment.

The Workplace Health and Safety Act 1995

The Workplace Health and Safety Act 1995 establishes obligations for people who affect workplaces to ensure health and safety. These obligations require all people who work in the drycleaning industry to take practicable steps to ensure health and safety. This responsibility does not just relate to employers and workers. It also includes manufacturers and suppliers of equipment, manufacturers and suppliers of substances and other persons at workplaces.

Practicability should be taken into account in determining health and safety issues. The degree of risk in a particular activity or environment can be balanced against the time, trouble and cost of taking measures to control the risk. The greater the risk, the more reasonable it is to spend considerable time, trouble and cost to reduce it. However, organisational size or financial position is no excuse for neglecting health and safety responsibilities.

Persons conducting a business or undertaking (e.g. employers, self-employed people)

have an obligation under the Act to ensure the health and safety of employees, members of the public and of themselves at work, or those affected by the work. This may include:

- providing and maintaining a safe and healthy work environment;
- providing and maintaining safe plant and equipment;
- ensuring the safe use, handling, storage and transport of substances;
- ensuring safe systems of work are used;
- providing information, training and supervision to allow employees to perform their work in a safe manner; and
- providing protective clothing and equipment as required, and providing training in its use and maintenance.

Designer, Manufacturer, Importer and Supplier responsibilities under the Act include:

- ensuring plant or substances are designed, constructed or manufactured to be safe and without risks to health and safety when used properly;
- arranging for any necessary testing and examination to ensure plant and substance are safe and without risk to health and safety when used properly;
- ensuring adequate information is available on the use of plant and substances so their use, will be without risks to the health and safety of any persons; and

- ensuring plant is erected or installed in a way which makes it safe and poses no risk to the health and safety of any person when used properly.

Workers responsibilities under the Act include:

- not wilfully placing themselves or anyone else at the workplace at risk of injury or illness;
- not wilfully or recklessly interfering with or misusing anything provided for workplace health and safety;
- complying with reasonable instructions from the employer to carry out a work procedure; and
- wearing supplied personal protective equipment when they have been trained how to use it.

The Act also sets out the consultative arrangements that must be established in workplaces to ensure employers and workers work together to manage health and safety. Consultation between employers and workers is essential for the successful management of health and safety at work. The Act sets out when Workplace Health and Safety Officers and Workplace Health and Safety Representatives must be appointed and when a Workplace Health and Safety Committee must be appointed. These requirements are discussed in Section 3.

Workplace Health and Safety Regulation 1997

The Workplace Health and Safety Regulation 1997 prescribes ways of managing exposure to particular hazards in workplaces. If a regulation exists for a hazard that is present in your workplace, to meet your obligation under the Act, you must do what the regulation says.

Examples of specific issues addressed in the Regulation that may be relevant to the drycleaning industry include:

- management of hazardous substances;
- management of noise exposure; and,
- competency of boiler operators.

Employers should determine which sections of the Regulation apply to their workplace and implement the requirements associated with those sections. Information on the requirements of the Regulation can be obtained from the Department of Industrial Relations website at www.dir.qld.gov.au (then follow the link to Workplace Health and Safety).

Codes of Practice

Codes of Practice provide practical guidance to employers, principal contractors, owners, occupiers, employees or any other person to whom obligations may apply under the Workplace Health and Safety Act. Each Code of Practice relates to a specific hazard in workplaces and provides guidance on managing that hazard.

Some Codes of Practice that may be relevant to the Drycleaning Industry include:

- Manual Tasks Code of Practice
- Hazardous Substances Code of Practice

- Plant Code of Practice
- Prevention of Workplace Harassment Code of Practice
- First Aid Code of Practice

No penalties can be directly imposed for failure to observe a provision of a Code of Practice. However, if an employer chooses not to follow the guidance provided by a Code of Practice they must adopt another method of controlling the risk that provides equal or better protection.

Codes of Practice are admissible as evidence in proceedings in which it is alleged that a person with an obligation has contravened or failed to comply with the Act. The person must satisfy the court that they adopted equivalent or better standards than those described in the Code of Practice. As such, all relevant Codes should be followed, and if another method is used, the reasons for this should be documented.

Penalties and Notices

Where there is an uncontrolled risk at a workplace, workplace health and safety inspectors may issue statutory notices to rectify the issue. There are generally three types of notices that an inspector can issue. These are:

- Improvement notices;
- Prohibition notices; and,
- Infringement notices.

Improvement notices describe the health and safety condition not met and how and when the failure must be corrected. Improvement notices are issued for administrative or 'low risk' issues. There is no penalty attached to an improvement notice. However, failure to comply with an improvement notice can attract a penalty.

Prohibition notices can be issued when there is a risk of a person sustaining a serious injury at a workplace. A prohibition notice may require an immediate stop to:

- a workplace activity;
- the use of plant, equipment or machinery; or,
- the use of a chemical or other substance.

Again there is no financial penalty directly associated with a prohibition notice. However, failure to comply with a prohibition notice can result in a person being taken to court and fined.

Infringement notices are 'on-the-spot' fines that can be issued by inspectors when a person fails to comply with a specific section of the Act or Regulation.

It is also possible for obligation holders to be prosecuted for significant breaches of the Workplace Health and Safety Act. Breaches of the law are extremely serious and as such the penalties can be substantial. The maximum penalty that can be imposed as a result of prosecution is \$150,000 and/or 3 years imprisonment for an individual and \$750,000 for a corporation.

3. Managing Health and Safety

Workplace health and safety is an important responsibility for any business operator. Failure in this area can and will lead to employee injury and disease with an associated, and often underestimated, cost to the employer. For your drycleaning business to maintain market competitiveness, your commitment is required in areas like production, quality, costs and personnel relations. As an employer, your commitment is also required in health and safety. This must start with you and extend through to all your employees. A lack of commitment will usually result in an ineffective health and safety program. Human resource issues such as job satisfaction and a supportive work environment can positively affect health and safety initiatives and results.

Effective management of health and safety makes good business sense. It can lead to:

- fewer accidents and illnesses;
- lower Worker's Compensation premiums;
- lower employee absenteeism; and
- better employee morale.

Health and Safety Consultation

Consultation on workplace health and safety matters is the best way to effectively manage workplace health and safety. Consultation involves discussions between you and your employees about workplace health and safety. As well, the consultation process could include employee representatives and Workplace Health and Safety Officers and Committees. Whatever the size of your business, consultation will help ensure preventative information is exchanged at the workplace.

Employee Consultation

As employees are most likely to know the risks associated with their work, health and safety consultation can lead to improved health and safety practices. Employee involvement in identifying problems and changing the workplace also helps ensure employees are committed to the changes. For instance, employee involvement can assist you to find out quickly which jobs are the most tiring and uncomfortable. Working together with your employees, you may agree to change the workflow of garments to presses to eliminate excessive reaching and twisting. In the end, everybody is in agreement and committed to the change. When planning changes to the workplace, consultation should take place as early as possible, and be an on-going process.

The consultation process can be informal, such as discussing health and safety issues at regular staff meetings or asking workers for input when making decisions about health and safety. This informal process is more suited to small businesses where there is regular contact between the employer and all staff members. The consultation process can also be more formal through the election of health and safety representatives and establishment of a health and safety committee. Larger businesses with more than 30 employees are also required to appoint a Workplace Health and Safety Officer who is an appropriately qualified person appointed to assist the employer meet their obligations.

Workplace Health and Safety Representatives

Under the Workplace Health and Safety Act 1995, your employees may elect a Workplace Health and Safety Representative. The Representative must be an employee at the workplace but does not need any specific qualifications or experience in health and safety. Workplace Health and Safety Representatives are entitled to:

- inspect those parts of the workplace for which the health and safety representative is responsible;
- assist in the review of workplace incidents and make recommendations arising out of those reviews;
- report in writing to:
 - (i) the Workplace Health and Safety Officer; or
 - (ii) the employer where a Health and Safety Officer is not required under the Act, about all matters which, in the Representative's opinion, concern the health and safety of persons at the workplace; and,
- participate in the activities of a health and safety committee, where such a committee is established.

Workplace Health and Safety Committees

The Act also provides for the establishment of Workplace Health and Safety Committees. You, the employer, may decide to set up health and safety committees on your own initiative. For example if your business has grown in size, you may decide to form a Workplace Health and Safety Committee. The Committee would oversee and guide your business's response to health and safety. Your full support is required to fully enable the Committee to undertake their functions. These functions include:

- creating and maintaining awareness and interest in health and safety;
- aiding co-operation between the employer and employees;
- developing and distributing standards, rules and procedures about health and safety;
- reviewing the circumstances surrounding work injuries, illnesses and occurrences; and,
- making recommendations to the employer on health and safety matters.

An employer may also be required to set up a committee at a workplace when:

- the health and safety representative requests such a committee, or
- the Chief Executive of Workplace Health and Safety Queensland gives written notice that a committee must be established because the nature of the work carried out at the workplace is particularly hazardous.

Workplace Health and Safety Committees must consist of at least two people and include any Workplace Health and Safety Officers and Representatives for your workplace. Further membership is at your discretion as the employer.

Workplace Health and Safety Officers

For businesses with 30 or more employees normally employed at the workplace, a suitably qualified Workplace Health and Safety Officer (WHSO) must be appointed under the Workplace Health and Safety Act 1995 (the Act). The WHSO must have completed an approved course and been issued with an accreditation by WHSQ. Duties of a WHSO include:

- conducting inspections to discover unsafe or unsatisfactory conditions and practices and report these to the employer;
- advising the employer on the overall state of health and safety in the workplace;
- ensuring all injuries, diseases and occurrences are recorded and investigated; and,
- assisting WHSQ inspectors in the performance of their duties.

The WHSO is required by the Act to conduct regular assessments of the workplace and to report the findings of these assessments back to the employer in writing. The employer must keep this report for at least 5 years and take appropriate action to address any health and safety issues identified. These assessments should generally be conducted at least once every 12 months.

Health and Safety Policy

In all drycleaning workplaces, a health and safety policy is an important tool for communicating the workplace's approach to health and safety. However, the policy should do more than duplicate the obligations in the Act. It should set clear goals for achieving high standards of health and safety performance for everyone at the workplace. The policy can include health and safety objectives, and the responsibilities of you, your employees, and anyone else who has regular contact with your business (e.g. contractors).

When developing a health and safety policy:

- consult with your employees or their representatives;
- distribute a copy of the policy to each employee; and,
- sign and display the policy statement in a prominent location in the workplace.

It is important that the health and safety policy is available and clearly communicated to all your employees so that they are aware of your health and safety expectations. Over time, the policy may need updating to incorporate changes at your workplace. An example of a health and safety policy statement is contained in Appendix 1.

Health and Safety Information

Provision of Information

Health and safety information is any information relevant to hazards in a workplace and ways to minimise associated risks. You should establish a system to maintain information on:

- plant and equipment, such as boilers, presses and irons;
- hazardous substances such as perchloroethylene and spotting agents;
- the correct use of personal protective equipment; and,
- work processes such as the method of operating a press or a drycleaning machine

This information is needed to:

- make decisions about health and safety;
- develop health and safety policies and procedures;
- educate staff; and

- reduce the potential for workplace injury and disease

Employees have a right of access to any information about their health and safety. Areas that should be brought to their attention include:

- hazard related information such as new equipment, substances, techniques and controls;
- relevant incident, accident and injury data; and
- information such as reports, posters, videos, and memos.

As an employer, you should provide information about your health and safety management system during an employee's induction. You could use this guide to help you prepare training material for your employees. Training will enhance responsible attitudes to workplace health and safety, and will aid in the implementation of your health and safety system.

Industry and Government Data

Where it is relevant or necessary, you could use other information sources for health and safety management. Such sources include Workplace Health and Safety Queensland, Q-Comp, industry associations, or consultants.

These bodies collect and analyse accident and ill-health data drawn from a far wider base than that available to an individual employer. Using both internal (e.g. reviews of incidents in your own workplace) and external information sources will enable you to achieve better health and safety management practices.

Training

Well trained staff members operate more efficiently and have fewer accidents because they know how to perform tasks correctly. Therefore, you should ensure your employees receive adequate health and safety training. Regardless of the size of your business, training can contribute positively to the health and safety culture at your workplace. Training also shows that you the employer are committed to your employees' health and safety.

Any health and safety training should focus on new employees as well as existing staff. The content of workplace health and safety training programs and the training methods used should be tailored to the specific needs of the group being trained. Effective training should consider literacy levels, language factors and capabilities of your employees. Where appropriate, oral methods such as explanations and demonstrations, visual methods such as videos and posters, and plain English or other appropriate languages should be used.

Training can be formal or informal. On-the-job training can be as effective in providing the necessary education as any other form. Training programs should include:

- safe work practices;
- hazards and risks in the workplace, and related reporting requirements;
- control measures in place to minimise risk;
- task specific training;
- safe operation of machinery and equipment;

- fitting, use and maintenance of personal protective equipment;
- accident/emergency procedures and related reporting requirements;
- employer and employee responsibilities in relation to their obligations under the Act; and,
- the role of Workplace Health and Safety Officers, Representatives and Committees, where required.

As an employer, you should ensure employees understand and can demonstrate skills for the tasks they do.

You should evaluate and review training programs in consultation with employees and, where applicable, their health and safety representatives. This will ensure the programs remain appropriate, effective and reflect current legislation. Employees in drycleaning businesses may need further training when, for example, new equipment or substances are introduced to work processes.

Preventive Maintenance of Plant and Equipment

Plant such as boilers, drycleaning machines and presses require regular maintenance to remain safe and efficient during operation. Regular maintenance of plant and equipment provides many benefits including:

- **Reduced Incidents** - proper maintenance can reduce injury and illness;
- **Reduced Downtime** - preventive maintenance minimises work schedule interruptions; and
- **Reduced Maintenance** - regular inspections provide opportunities to make minor repairs and adjustments that will help prevent unnecessary and costly repairs.

Manufacturers' specifications should be followed when maintaining plant. Without such specifications, other proven and tested procedures should be followed. For example there may be Australian Standards relevant to the plant and equipment you use that specify when maintenance should be performed.

Maintenance records should show what work was done, when it was done, by whom and the cost. This information is helpful in scheduling future maintenance. You can also use these records to measure the effectiveness of the maintenance program.

Record Keeping, Accident Investigation and Reporting

Collection, analysis and assessment of health and safety information should be a key part of a health and safety management system. This information can come from your own workplace in the form of:

- staff reporting health and safety problems;
- Workplace Health and Safety Officer assessments;
- Accident and near miss investigation reports; and,
- First aid records.

Recording and reviewing information helps you to identify less obvious hazards and develop strategies to improve health and safety.

Record Keeping

Keeping accurate records is an essential element for maintaining a healthy and safe workplace. Some of the things that records should be kept for include:

- Injuries and illnesses that occur at the workplace and the results of investigations into those incidents;
- Health and safety committee meetings;
- Rehabilitation and compensation records;
- Job safety analyses and risk assessments;
- Training;
- Inspection, maintenance and repair of plant and equipment; and,
- Medical records - first aid, sickness/absence records.

These records can help you:

- **Meet legal requirements** – for example, the Workplace Health and Safety Act requires employers to keep records of any illness or injury that occurs as a result of the operation of their business, regardless of the severity. The employer is also required to keep records of assessments undertaken by a WHSO. Employers are also required to keep records of some risk assessments, such as those for hazardous substances. Keeping records of those items listed above can also provide good evidence in the event of an incident or inspection that steps are being taken to manage health and safety at the workplace.
- **Detect the causes of work related illness and injury** – by reviewing the records associated with injuries and illnesses the real causes can be established and appropriate steps taken to prevent a similar incident occurring again.
- **Identifying previously unknown hazards and implement controls before they cause an injury** – by keeping and reviewing records of minor injuries and near misses, previously unknown hazards may become obvious and can be controlled before they result in a more serious injury or illness. Reviewing maintenance and inspection reports can also help identify defective equipment that may cause an injury or illness.
- **Assess the effectiveness of prevention and control programs** – similarly, reviewing injury and illness records can indicate if controls put in place have been effective. Incorporating a feedback or evaluation component to training records can also help you determine if the training you are providing is being effective.

Accident Investigation

You should investigate accidents to get factual information that can be used to determine how the accident could have been prevented. Any accident, especially those involving property damage or personal injury, should be investigated as soon as possible. The amount of investigation should be in proportion to the accident's seriousness or potential for seriousness.

To investigate an accident, follow these steps:

- get the facts;
- determine the cause;

- select a method of prevention;
- take appropriate action; and
- keep everyone at the workplace informed.

From the information gathered in the investigation you can take appropriate action to minimise future accidents. This information:

- provides a yardstick for determining what control measures are needed;
- helps determine what action should be taken; and
- is an index of your concern for accident prevention.

In a larger organisation, there should be a periodic review of all accident information to determine any pattern developing.

Reporting

Having your employees report minor injuries and illnesses, discomfort or pain and any other concerns will assist you manage health and safety and prevent serious injuries and illnesses. Early reporting can make the difference between rapid recovery and a serious injury or disease resulting in a lengthy absence from the workplace.

As an employer you are also required to report an injury that results in a person being away from work for more than four days and any work caused illnesses to Workplace Health and Safety Queensland. You may also need to report other incidents even if they don't cause an injury such as:

- explosions or fires
- damage to a boiler
- uncontrolled release of steam or gas
- the escape, spillage or leakage of a hazardous material (e.g. chemicals).

Emergency Planning

You should develop procedures to ensure you and your employees can deal with accidents and emergencies, both on and off-site. These procedures need to be developed for workplaces of all sizes. They should include:

- a means by which cases of serious traumatic injury can receive earliest possible access to treatment;
- a means by which all persons in the workplace can be accounted for;
- assigning responsibility for various emergency tasks to individual employees;
- availability of suitable emergency equipment and materials to minimise the severity of any accident or emergency;
- appropriate involvement of relevant authorities for example Police, state emergency service, local authority and fire service, in your accident response plan;
- systems for evacuation, for example in the event of a fire, chemical spillage or bomb threat;
- a system of communication to all employees and others for example visitors and neighbouring businesses;
- appropriate training of your employees in accident/emergency procedures; and
- a review process to ensure established procedures can meet changing situations.

You should document accident/emergency procedures and ensure all employees are aware of these procedures. You can achieve this by holding regular emergency and evacuation drills.

First Aid

As an employer, you are responsible for providing adequate facilities for the health and safety of employees. This includes the provision of adequate and appropriate first aid facilities and access to trained personnel.

You are responsible for:

- the selection, location and maintenance of first aid facilities;
- the policies, procedures and processes associated with the use of first aid services and facilities; and,
- the selection and training of first aid personnel.

You should ensure first aid facilities are appropriate for the workplace. To achieve this, you should also consider:

- the nature of the work performed and the associated hazards;
- the likely injuries or diseases needing treatment;
- the chemicals and other substances you use (e.g. if you use hydrofluoric acid as a spotting agent you should supply calcium gluconate gel in your first aid kit)
- the location, layout and size of your workplace; and,
- the number and distribution of employees.

First aid facilities should be at a point convenient to where your staff work or where the risk of injury is greatest. In a large working area, first aid facilities should be in more than one location. Your employees should always have access to first aid. This means that at a large workplace, at least one person with current training in first aid should be available to treat injured employees. At a small workplace, other arrangements could be made with a local doctor or nurse in consultation with your employees. It is important that people trained in first aid do not treat beyond their level of training and expertise.

See the *Code of Practice for First Aid* from WHSQ for further information.

Rehabilitation

The aim of rehabilitation is to achieve a rapid and safe return of an injured or ill worker to normal duties. If this is not possible, the aim is to achieve a return to appropriate duties which ideally secure the long term employment of the employee concerned. An effective rehabilitation program reduces the time injured or ill workers are away from work. It also reduces costs associated with workers' compensation and the selection and training of replacement staff. Benefits to employees such as maintenance of social contacts, work habits, morale and work fitness also benefit you, the employer.

Of particular relevance to employers is workplace-based rehabilitation. This form of rehabilitation program is performed entirely or in part, at the worksite using normal or selected duties. It involves the use of regular work tasks graded to the capabilities of an injured or ill worker and as approved by the treating doctor.

Factors to consider when setting up a worksite rehabilitation program include:

- nature of the employee's injury or disease, and resultant capabilities;
- possible short or long term job modifications; and,
- possible need for a gradual build up to normal hours and normal duties.

The benefits of a workplace rehabilitation program can be gained for both work and non-work related injuries and illnesses. Q-Comp (the regulatory authority for rehabilitation in Queensland) has an advisory service that can assist in the implementation of a rehabilitation program.

4. Risk Management

Risk Management - The Procedure

Risk management plays an important role in the management of workplace health and safety. It is a logical and systematic approach which can result in a reduction in the incidence of injury and disease. Risk management involves:

1. identifying hazards*;
2. assessing the risk* that may result because of those hazards;
3. determining appropriate control measures to eliminate or minimise those risks;
4. implementing the controls you decide on; and,
5. monitoring and reviewing the effectiveness of your control measures.

*** A hazard is something with the potential to cause injury or disease. A risk is the probability of a hazard resulting in an injury or disease, combined with the seriousness of the injury or disease that may occur. For example, electricity is a hazard but may not be a risk unless it is incorrectly wired, or the wiring is exposed.**

Under the Workplace Health and Safety Act 1995 employers are required to use the risk management process to manage health and safety in their business. This is because the information gained through the risk management process guides you towards measures that should be taken to prevent reasonably foreseeable harm.

(1) Hazard Identification

You can use several methods to identify hazards in the drycleaning industry. The type of work processes involved will determine the method selected, and a combination of methods may give the most complete results. Methods of identifying hazards include:

- reading the hazard information in this guide and comparing it to your own workplace (see Sections 5 and 6)
- consultation with your employees (see Section 3);
- walk-through inspections of the work site using, for example, a hazard checklist;
- work processes evaluation;
- incident, accident and injury data (see Section 3);
- material safety data sheets and product labels; and
- consultation with specialist practitioners, industry associations, unions and government bodies.

For an explanation of specific hazards in your industry, refer to Sections 5 and 6 of this guide.

(2) Risk Assessment

The risk assessment process allows you to rank the risks associated with the hazards in your workplace. This allows you to decide the timeframe within which an issue should be addressed and the resources that should be committed to minimising that risk. In assessing the risks, ask yourself:

- what is the nature of the hazard?
- how severe is the hazard and the possible health effects?
- how often and for what length of time are people exposed to the risk?

- how likely is it that an event will occur?

Categories of risk can be thought of in everyday terms as:

- risks to health and safety that are minor, and unlikely to occur. No further action is required other than maintaining the risks at that level.
- risks that are minor but may occur frequently. The outcome may not be serious but someone will get hurt. Corrective action should be taken quickly.
- risks so great that alterations to working arrangements must occur as a matter of priority.

Risk assessment is something we do all the time, not just at work. For example, crossing the street has an element of risk. When crossing a street that has little traffic, a person looks both ways, listens for traffic, then crosses. In contrast, if the street is very busy, a person would use a pedestrian crossing. This crossing is a 'control measure' to reduce the risk of an accident. The same principle applies in your drycleaning business.

The *Risk Management Code of Practice* available from Workplace Health and Safety Queensland includes an example risk assessment process that can be used by businesses.

(3) *Decide on controls*

For every hazard there are a range of measures available to control the risk. Some types of controls are more effective than others. When deciding what type of control you are going to implement, using the 'hierarchy of control' can help you identify the most effective control option or options. The higher in the hierarchy the control is the better and more reliable the control will be.

The hierarchy of control in order of effectiveness is:

- 1. Eliminate the hazard** – by eliminating the hazard from the workplace altogether there is no possibility of it causing an injury or illness. For example, by outsourcing electrical repairs to a trained electrical contractor you eliminate the risk to your workers from this hazardous work;
- 2. Substitute the hazard** – by substituting a hazardous product, material or process with a less hazardous one you permanently reduce the level of risk. For example, by replacing manually operated presses with automatic presses, the manual handling risks are permanently reduced;
- 3. Isolate the hazard or minimise risk with engineering controls** – by making changes to the work environment you can minimise the risk of a hazard coming in contact with a person. For example, having a fume extraction system on drycleaning machines minimises the amount of Perc vapour that can be inhaled by workers. Another example is enclosing an air compressor may prevent excessive noise escaping and causing hearing damage;
- 4. Administrative controls** – attempt to reduce risk by encouraging people to act in a healthy and safe way. Some common administrative controls include providing training, establishing safe work procedures, erecting warning signs and implementing task rotation; and,
- 5. Personal Protective Equipment (PPE)**- involves using appropriate protective clothing or equipment to protect people from a hazard. For example, wearing the correct

gloves, a properly fitted and appropriate respirator and an apron when cleaning out the button trap of a drycleaning machine, will reduce the risk of a person being exposed to Perc.

Administrative controls and PPE are the least effective types of controls and should only be relied on as your primary control when the options higher in the list have been exhausted. Administrative controls and PPE rely on people complying with instructions and commitment, enforcement and supervision from management. Generally, these types of controls should only be used:

- when all other control options are impractical (i.e. as a last resort)
- as a temporary measure while more effective and long-term solution can be implemented
- to supplement other higher order controls (e.g. if an automatic press is introduced to reduce manual handling risk, staff will need to be trained how to use it properly).

(4) Implementing control measures

Once you have decided what control measures you are going to use they need to be implemented effectively to ensure their success. To ensure that the controls you implement work you may need to:

- develop work procedures (e.g. establishing work procedures for the operation of new less hazardous equipment and machinery);
- inform your workers about the changes you are making and clearly communicate why these changes are being made;
- provide training and instruction about the changes so that everyone is familiar with them;
- supervise the use of the new control measures to ensure they are being used correctly; and,
- maintain the control measures so they continue to work effectively in the future.

(5) Monitoring and reviewing control measures

To ensure the controls you have implemented do not create new risks and continue to be effective you should periodically review the control measures. To do this it might be useful to ask yourself and your staff certain questions, such as:

- Are the control measures in place and being used?
- Are the control measures being used correctly?
- Have the control measures implemented eliminated or minimised the risk as intended?
- Have the control measures created any new problems?
- Have the new control measures made existing problems worse?

It is important that the full cycle of risk management is completed to ensure hazards are effectively controlled. Risk management is an ongoing process that needs to be repeated regularly. How often this process is repeated will depend on the level of risk at your workplace and how often work processes, equipment and the work environment change.

5. Drycleaning Hazards

Manual Tasks

Manual tasks are any activity where a person is required to lift, lower, carry, push, pull, move, hold or restrain any object or body part. The most common types of injuries that manual tasks cause are sprains and strains of muscles, tendons and ligaments. These injuries can occur immediately as a result of performing one hazardous manual task (e.g. lifting an excessively heavy box). However, sprains and strains are more commonly the result of minor damage to muscles, ligaments and tendons accumulating over a period of time (i.e. months or years) that eventually leads to a major injury.

Sprains and strains are the most common injuries in the drycleaning industry. However, if manual task risks are managed effectively, the personal and financial costs associated with these injuries can be reduced.

Risk Management Approach

Risk management for manual tasks can be reduced to a three step process:

- **Risk identification** – not all manual tasks are hazardous. The risk identification process involves identifying the manual tasks performed at your workplace that could cause an injury.
- **Risk assessment** – this involves analysing the hazardous manual tasks you and your employees perform to determine their importance and look for their causes.
- **Risk control** – this involves identifying and implementing controls to eliminate or reduce the risk hazardous manual tasks are creating.

Risk identification

Nearly all activities performed by people in the drycleaning industry will meet the definition of a manual task. However, not all of these tasks will have the potential to cause injury. Only those manual tasks that involve one or more of the following risk factors have the potential to cause injury:

- *Forceful exertions* – using the body to apply a lot of force to objects places strain on the muscles, tendons and joints which may lead to an injury.
- *Awkward or static body postures* – when a task is performed with a body part that is not in its normal position (e.g. lifting something overhead) the muscular effort involved increases. If a person performs a task that requires them to hold a body part in one position for a long time, the muscles that move that body part can't rest and recover properly. Both of these factors increase the risk of injury.
- *Repetitive movements* – if a task involves a body part making the same movements repeatedly then the muscles become fatigued and cannot recover properly increasing the 'wear and tear' on body tissues. Repetitive tasks generally need to be performed continuously for more than 60 minutes to be a problem.
- *Vibration* – vibration from sitting or standing on heavy machinery or vehicles (e.g. forklifts, delivery trucks) can lead to degeneration of the vertebrae and discs in the back leading to low back pain. Handling vibrating tools (e.g.

electric drills) can disrupt blood flow to the muscles of the hand and arm and cause damage to nerves and tendons.

Identifying *hazardous* manual tasks involves identifying those manual tasks you and your employees perform that involve one or more of these risk factors. If your workplace is small, directly observing people while they work is the easiest way to identify where people are performing hazardous manual tasks. If your workplace is larger you may need to narrow down which tasks or work areas you are going to observe. This can be done by:

- **Consulting with your employees** – the people who perform specific tasks will be able to tell you if it causes discomfort or pain and will often have practical suggestions for how those tasks could be improved
- **Analysing injury records** – analysing injury records can help identify trends in particular jobs or work areas that may indicate that a problem exists

Risk Assessment

Once you have identified the tasks in your workplace that have the potential to cause a sprain or strain, you need to assess the level of risk these tasks represent to decide which you will address first. By examining the tasks more deeply you should also be able to identify what is causing the problem which will help you identify appropriate controls.

Factors that will influence the level of risk include:

- the number of risk factors present in the task – if the task has two or more of the risk factors discussed above it is likely to have a higher risk of causing an injury
- the magnitude of the risk factors involved – the greater the magnitude of the risk factor the greater the level of risk (e.g. a person lifting a 40kg bag of garments is likely to be at greater risk of injury than a person lifting a 10kg bag; a person repeatedly bending down to pick up items from floor level height is likely to be at greater risk of injury than if they were picking items up from thigh height)
- how long the task is performed for – the longer people are performing a hazardous manual task the more likely it is to cause an injury
- how often the task is done – the more often the task is done the more likely it is to cause an injury
- the number of workers performing the task – the more people performing the task the greater chance it will cause an injury

By examining each task in relation to these factors you can prioritise the tasks and decide which you will address first and which require greater levels of control.

During the risk assessment process you may also be able to identify what is influencing or causing the risk factors in the task. By identifying what is influencing the level of risk you may be able to identify where changes can be made. The factors that influence manual task risk are:

- **Work area design** – the design of benches, conveyors, equipment and other workstations can influence the postures people have to adopt when performing a task such as over-reaching and bending/twisting the back

- **Hand tool use** – poor design and excessive use of hand tools can cause hand, wrist and forearm disorders by increasing the muscular effort required, causing awkward wrist postures and exposing people to hand-arm vibration
- **Load handling** – a task that involves a person lifting and carrying a load (e.g. boxes, bags, containers of solvent etc.) may result in a person applying a lot of force and/or adopting an awkward posture (e.g. twisting the back to move an item from a press to a conveyor). Load handling may also be repetitive.
- **The nature of loads handled** – loads that need to be manually handled can increase the risk of over-exertion. Loads that are large and bulky, difficult to grip or unstable can lead to people using more force to handle them.
- **Work organisation** – inadequate staffing levels, high work rates, lack of task variation and inadequate rest breaks can all increase how often and the length of time a hazardous manual task is performed. They can also reduce recovery time.

It is also important to keep in mind that people with particular physical characteristics (e.g. young workers, older workers, workers who have recently had an injury, pregnant workers) may be at greater risk of sustaining a sprain or strain. Extra precautions may be needed to protect these workers from injury such as:

- avoiding allocation of physically demanding work to young workers
- allowing pregnant workers to self-regulate their pace of work
- gradually reintroducing injured workers back into their normal role
- seeking professional assessment and advice from a health professional (e.g. an occupational therapist) about the tasks a person is required to perform.

Risk Control

After risks have been assessed, they should be removed or reduced by the use of control measures. Controls for manual task risks can generally be divided into two categories:

- **Design controls** – these involve altering the physical aspects of the workplace or altering the work process to reduce risk (e.g. decreasing the size of garment trolleys to reduce the weight that workers have to push).
- **Administrative controls** – are aimed at modifying the way people perform their task and adopt safer behaviours (e.g. worker training, job rotation).

Design controls are preferred because they address the *source* of the risk (i.e. the thing that is causing the risk) and have the advantage of being permanent. Administrative controls can only reduce exposure time or frequency and may be forgotten in stressful conditions (e.g. when meeting deadlines, or coping with staff reductions). Administrative controls also require ongoing supervision to ensure their effectiveness. However, administrative controls can be useful as supplements to design controls (e.g. training staff in the correct way to perform a task) or as temporary measures while permanent controls are being implemented.

Below are some examples of controls that may be used for addressing the four risk factors for manual tasks.

Where a lot of force is involved:

- reduce the weight of the item being pushed, pulled, lifted or carried (e.g. use smaller bags for carrying dry cleaning; don't overload trolleys)
- provide mechanical aids for moving heavy items and alter the layout of the workplace to reduce the distance heavy trolleys need to be moved (e.g. trolleys, monorail systems for drycleaning bags)
- make sure mechanical aids such as trolleys are suitable for the task (e.g. large enough wheels; appropriate handles) and people don't have to push them up steep/long ramps or over soft floor surfaces (e.g. carpet; grass)
- maintain mechanical aids to make sure they work properly - many trolleys have damaged wheels that increase the amount of force needed to move them
- team lifting is not the best way to move heavy items and should only be used where all people involved have been adequately trained in team lifting techniques and the load can be shared equally during the whole movement

Where awkward or static postures are involved:

- store heavier items on middle shelves and lighter items on high and low shelves
- use trolleys with spring loaded bases to keep the load at a suitable height
- set washers and driers at a height that minimises the amount of bending and reaching needed to load and unload them
- adjust the height of work stations, such as those used for sorting and folding drycleaning, to minimise bending and reaching
- provide a seat or sit/stand chairs that allow people to change their posture when necessary
- install a horizontal bar at the bottom of workbenches for foot support
- install anti-fatigue matting on hard floor surfaces
- encourage workers to take short breaks and organise work so that people have to occasionally get up and move

Where repetitive movements are involved:

- use machines to reduce the need for people to do repetitive tasks (e.g. automatic machines; using presses instead of hand held irons)
- give people a break from repetitive tasks by doing other things so they can use different parts of their body

Where vibration is involved:

- Replace vibrating tools and equipment with products that produce less or no vibration
- Keep vibrating tools and equipment in good condition
- Improve vibration dampening in the seats of forklifts, trucks and other vehicles and keep seats in good condition
- Reduce the amount of time people are exposed to vibrating equipment by implementing job rotation or an increased number of rest breaks

Remember that risk management for all hazards is an ongoing process. You should assess the effectiveness of controls you implement for manual tasks after instituting them and periodically as part of your ongoing risk management process.

Hazardous Substances

Chemicals are part of normal activities in the drycleaning industry. Therefore, people will frequent contact with these chemicals. You must know the chemicals used, the potential risk of using these chemicals and what you can do to reduce the risk.

Chemicals such as perchloroethylene can be brought into a workplace and materials such as asbestos can already be part of your workplace. In both of these cases they are substances which can be harmful to health and are classified as hazardous substances. As an employer, you have an obligation to minimise the risk of injury or illness your employees face while using these chemicals. The level of risk will depend on the toxicity of the substance and how the substance is used, stored and handled in the workplace.

In the safe use of hazardous substances, you should:

1. Obtain **information** about all the hazardous substances used in the workplace.
2. **Assess the risk** associated with using, handling and storing each hazardous substance.
3. Implement **control measures** to reduce the risks associated with hazardous substances.
4. Provide **information and training** for yourself and employees on the hazardous substances used at the workplace.

COMMON HAZARDOUS SUBSTANCES:

Product Name and Where Found/Used	Hazardous Materials/Chemicals	Nature of Risk
Perc (Most common cleaning agent. Leakage of vapours from drycleaning machines especially around door seals and during transfer of improperly aerated loads.)	Perchloroethylene	Inhaled vapours can cause dizziness, light-headedness and in extreme cases, unconsciousness. Serious liver and kidney disease can result from long term exposure. Very toxic gases can be produced at high temperatures. Therefore, smoking should be strictly prohibited around drycleaning substances. Prolonged skin contact can lead to diseases such as dermatitis.
Cleaning Agent (used in older machines.)	White Spirit	Inhalation can cause central nervous system depression. Fire hazard (flammable).

Spotting Agents (especially rust removers) (Manual spotting of resistant stains.)	Hydrofluoric Acid	Rust removers usually contain hydrofluoric acid which can cause serious deep and delayed burns. These burns require urgent medical treatment
Bleaching agent	Hydrogen peroxide Sodium hypochlorite	Corrosive irritant by inhalation or skin contact. Hydrogen peroxide is a fire and explosive hazard. Sodium hypochlorite can produce hazardous concentrations of chlorine gas.
Lagging (on steam pipes and boilers.)	Asbestos	
Lagging (on steam pipes and boilers.)	Synthetic Mineral Fibres	

THESE ARE ONLY SOME OF THE HAZARDOUS SUBSTANCES USED IN DRY CLEANING WORKPLACES. YOU WILL NEED TO IDENTIFY ALL THE HAZARDOUS SUBSTANCES YOU USE AND ASSESS THE RISK THEY POSE.

What To Do:

1. Obtain information about hazardous substances:

Material Safety Data Sheets

The best source of information about the hazardous substances you use is the Material Safety Data Sheets (MSDS) for those products. A supplier must provide an MSDS for a hazardous substance when they first supply it to you or when you request it. The manufacturer of the substance may also be able to supply a MSDS to you. The information in the MSDS is more detailed than the information on the label and provides essential information on the safe use of the substance. This information should be incorporated into the safe work practices at your workplace.

A MSDS provides general information about a substance including:

- The appearance, odour and common names for the substance
- The health effects of exposure to the substance
- Recommendations for preventing or minimising people's exposure to the substance
- First aid information if a person is exposed to the substance

The MSDS contains information on the hazards associated with a substance. However, this information is generic and you need to consider how you use the substance at your

workplace. The risk involved with a hazardous substance will depend on the concentration of the substance, the quantity of the substance being used, the time of exposure, the workplace tasks and other workplace conditions. Guidance on assessing the risk associated with a hazardous substance is provided later.

Once you have obtained a MSDS for each hazardous substance used at the workplace they should be kept in a hazardous substance register (e.g. a folder) for easy reference. A list of the hazardous substances should be kept at the front of the register. A register template is provided at Appendix 2.

The MSDSs (i.e. the register) need to be kept at the workplace in a location near where they are being used and where everyone has access to them. In small workplaces this may be in the office. For larger businesses multiple copies may need to be made of the MSDSs and kept at various locations around the workplace (e.g. in the office, near spotting tables, near chemical stores). Employees should be shown where the MSDSs are kept and know how to access the information in an MSDS.

Labels

The labels on containers of hazardous substances are another good source of information about the safe use of the product. Each container of a hazardous substance should have a label with safety information on it when it is supplied to you. If you then transfer this substance into another container you need to make sure this new container is labelled with:

- The name of the substance;
- The concentration of the chemical if it is diluted; and,
- The important safety information about the product from the original label (e.g. 'Flammable', 'Avoid contact with skin' etc.)

Do not decant hazardous substances into old food or beverage containers even if you remove the original label. This practice increases the risk of a person confusing the contents of the container and ingesting a potentially harmful substance.

If a container does not have a label and the contents of a container are unknown, attach a temporary label where practicable. If the product name is unknown, label it:
"CAUTION. DO NOT USE. UNKNOWN SUBSTANCE."

Store a container of an unknown substance in isolation until you can identify the contents. Once identified, you must label the container. If you cannot identify the container's contents, arrange for its acceptable disposal. Consult with your local Council about the correct disposal of unknown substances.

2. Assess the risk:

The purpose of assessing the risk associated with hazardous substances is to determine appropriate controls for preventing or minimising the harm those substances may cause. The MSDS is essential to the risk assessment process as it will outline the specific hazards of the substance being assessed. However, the risk assessment process also requires you to look at how the substance is used in *your* workplace to determine the actual risk of injury or illness.

Your risk assessments should at least consider the following areas:

- the risks or effects of exposure associated with using/storing the hazardous substance
- the way in which people in your workplace may be exposed to the substance
- how much of the substance people are exposed and how long are they exposed to the substance
- the control measures recommended by the manufacturer/supplier of the substance to prevent or minimise exposure to the substance
- the control measures you are actually using to prevent or minimise exposure to the substance
- how are the existing control measures inspected and maintained to ensure their effectiveness (if appropriate)

To effectively assess these issues observation of how substances are used and consultation with the workers who use those hazardous substances are essential steps. Also keep in mind that with concentrates, any information supplied applies to the raw concentrate and not to the chemical at application strength. However, it should not be automatically assumed that the formulation is less hazardous at application strength.

Considering the above issues should allow you to evaluate the risk associated with using the hazardous substance. The conclusions you may draw from this assessment will generally fall into one of four categories:

1. The risks are **NOT SIGNIFICANT** now and not likely to increase in the future – this conclusion may be reached if the amounts or rate of use are too small to create a risk even if controls fail or the controls implemented strictly conform to those recommended by the MSDS and label and there is no chance of these controls failing or being ignored. If the risks are not significant then no further action needs to be taken.
2. The risks are **SIGNIFICANT** and effectively controlled, but could increase in the future – this conclusion may be reached if serious health effects could occur if current control measures fail or deteriorate (e.g. PPE is not used properly; the effectiveness of extraction systems deteriorate over time). If you believe a significant risk is being effectively controlled but things could change in future, determine how you will maintain the controls you have in place and how you will manage unexpected high risk events (e.g. a spill).
3. The risks are **SIGNIFICANT** and not effectively controlled - this conclusion may be reached if use of the substance could result in adverse health effects and the controls in place are not adequate to prevent or minimise exposure to a safe level. If this conclusion is reached, determine what control measures can be implemented to achieve a permanent reduction in the likelihood of exposure to the substance. More information on determining and implementing control measures is provided later.
4. **UNCERTAIN** about the risks – this conclusion may be reached if you cannot accurately predict the level of exposure (this is primarily related with substances that give off high levels of fume/vapour which cannot be determined without performing a more detailed investigation). If this conclusion is reached, air monitoring or biological monitoring by a specialist may be required to get a clearer picture of actual exposure to the substance

and a definite conclusion reached about the risk of exposure. However, until this conclusion is reached controls should be implemented to minimise exposure.

The risk assessments you perform must be recorded and kept for 30 years if the conclusion is that the risks are significant (if the conclusion is the risk is not significant the risk assessment only needs to be kept for 5 years). An example hazardous substances risk assessment format is provided at Appendix 3. Keeping these risk assessments with the MSDS for the substance in your hazardous substance register will ensure workers have access to most important information about substances in one location.

3. Implement Control Measures

Additional control measures will need to be implemented if your risk assessment shows that there is a risk of a person being exposed to a hazardous substance. Your controls need to address all possible routes of exposure that are relevant to the substance (i.e. inhalation, skin/eye contact, and ingestion). As with any hazard, you should always apply the hierarchy of control to determine the best controls.

Elimination – if a substance or work activity is not essential to your drycleaning business, you may be able to eliminate it (and any possible exposure to the hazardous substance). For example, you may be able to clean some stains using steam instead of potentially harmful spotting agents.

Substitution – manufacturers of chemicals are frequently producing new products that may be less hazardous than the products you are currently using. As such, you may be able to replace some of the hazardous substances you are using with products that are less hazardous (e.g. replacing Perc with silicone-based solvents). This permanently reduces the level of risk you and your employees are exposed to from the hazardous substance.

Engineering controls – by making changes to your equipment or workplace you can prevent people coming in contact with the hazardous substances you use. Two types of engineering controls are usually possible:

- **Isolating the substance from people.** This is done by reducing the handling of hazardous substances by isolating and confining them in equipment or areas of the workplace. For example, the use of closed system drycleaning machines and automated liquid dosing units.
- **Ventilation to reduce exposure to fumes/vapours.** When a hazardous substance that gives off a fume/vapour cannot be completely isolated, ventilation (e.g. an extraction system or improved natural ventilation) can remove contaminated air at its source and limit its spread throughout the workplace.

Administrative controls – by establishing good work practices you can limit the extent of exposure people have to hazardous substances. Examples of these work practices include:

- Regular inspection and maintenance of door seals, pipe connections and extraction systems can prevent exposure to excessive amounts of perchloroethylene.

- Only removing loads after the aeration cycle has been completed and allowing sufficient time between removal of loads and pressing.
- Capping containers of hazardous substances immediately after use and leaving them capped between uses.
- Putting procedures in place for the clean up of **spills** using a suitable absorbent material such as sand or earth. For cleaning up Perc spills old blankets can be used and then put in machines to reclaim the solvent.
- Removing containers of flammable substances from work areas or heavy traffic locations especially next to workplace exits.

Personal Protective Equipment (PPE) - is the least reliable control measure but may be necessary to supplement other control measures. In all cases protective equipment must be appropriately selected, individually adapted and users trained in its correct use and maintenance. PPE will commonly be required when:

- cleaning the still, replacing the filtering material and cleaning the button and lint traps. High levels of perchloroethylene can be expected during these operations;
- transferring Per into machines;
- using some spotting agents; and,
- cleaning up spills.

4. Provide Information and Training

Provide information, instruction, training and supervision to workers required to work with hazardous substances. The purpose of information and training is to make sure you and your employees have the skills and knowledge to handle chemicals in a manner that is safe and without risk to health.

Two good sources of information are the MSDS and the risk assessment for the hazardous substance. By making your employees familiar with these two documents they will have the most accurate and relevant information about the safe use of the substances they may be exposed to. The training should be provided when an employee first starts and on an ongoing basis to refresh their knowledge and skills (or when something about the use of the substance changes).

A record of the training you provide can be kept using the training record template at Appendix 4.

Hazardous Substances in Enclosed Systems

Where a hazardous substance is contained in an enclosed system, such as a pipe or piping system it must be identifiable to an employee or any other person who may be exposed to the contents if it escapes. The best way to identify hazardous substances in an enclosed system is to follow the Australian Standard 1345, '*Identification of Contents of Piping, Conduits and Ducts*'. This Standard sets out methods for identifying the contents of piping, conduits and ducts by the use of colours, letters and symbols.

N.B. *If you are storing or using chemicals at your workplace you may also have obligations under the Dangerous Goods Safety Management Act 2001. This legislation is aimed at managing the immediate threat to people, property or the environment (e.g.*

fires, explosions, spills that affect the environment) from particular hazardous materials. More information about dangerous goods can be obtained from the Department of Emergency Services.

Heat Stress

Hot working conditions may lead to a workplace health and safety problem known as 'heat stress'. This occurs when the body is unable to lose heat fast enough to maintain a steady core body temperature. Potential health effects for employees under increasing levels of heat stress include:

- discomfort;
- irritability;
- dehydration;
- reduced concentration/attention;
- prickly heat (heat rash);
- reduced tolerance to chemicals and noise exposure;
- heat cramps;
- heat exhaustion; and
- heat stroke.

Heat cramps, heat exhaustion and heat stroke are the most serious forms of heat illness. Factors involved in producing heat stress are:

- high air temperature;
- high humidity
- low level of air movement;
- high radiant temperature
- unsuitable clothing which limits body cooling
- high level of physical activity.

People who work regularly in a hot environment become acclimatised to a certain level of heat within about a week and once achieved, this is lost progressively over about a month after exposure has ceased. Acclimatisation reduces heat discomfort, increases the effectiveness of sweating, reduces salt loss and returns heart rate to normal. People differ in their ability to acclimatise to heat and those in good physical condition acclimatise more rapidly. Acclimatisation provides only partial protection from extreme heat and adverse health effects to exposed employees may still occur.

Control of Heat Stress

In the dry cleaning industry, large amounts of water are heated or significant amounts of steam generated, resulting in hot, humid conditions. These factors may result in heat stress of workers particularly on hot, humid days.

How Employers Can Limit Heat Stress Exposure

Generally, the best way to reduce the risk of heat stress in the workplace is to minimise the amount of heat and humidity in the workplace by altering the work environment.

Some examples of how this can be done include:

- reducing the amount of heat generated or emitted by equipment and processes, eg. by lowering the process temperature, relocating, cooling, coating or insulating the heat source using radiant reflective shielding;

- modifying air temperature, relative humidity and air movement, eg. by using general or local ventilation, evaporative or refrigerative cooling, spot coolers, blowers, fans or by opening windows;
- eliminating additional sources of water vapour in the workplace, eg. leaks from steam valves, evaporation of water from wet floors;
- reducing the physical demands of the work, eg. by mechanising heavy tasks;
- minimising exposure of work areas to direct sunlight, eg. by providing awnings on exposed windows;
- supplying a cool, shaded rest area for employees, close to the work area;

The risk of heat stress can also be reduced by implementing administrative controls and making changes to work schedules and clothing requirements. These might include:

- encouraging employees to wear light-weight, light-coloured and loose-fitting clothing, eg. by supplying uniforms of this type;
- providing cool water and making this available in a convenient place for employees;
- providing employees with information and training on the work practices when working in hot environments;
- ensuring that any first aid staff are trained in recognition of heat symptoms and treatment of heat stress;
- shortening heat exposure duration, eg. by rotating staff between high and low heat stress areas and/or providing regular breaks away from hot/humid areas;
- restricting overtime and double shifting in hot work areas;
- scheduling routine maintenance and repair work in hot areas for the cooler seasons of the year;
- adding extra personnel to reduce exposure time for each member of a crew.

How Employees Can Help Avoid Heat Stress

Some general precautions your employees can take to minimise the effects of heat stress when working in very hot and humid conditions include:

- keeping well hydrated – most heat illnesses are caused by dehydration. The sensation of thirst lags behind actual dehydration so it is important for people working in hot and humid conditions to regularly drink cool liquids to maintain hydration (e.g. 150-200millilitres of cool fluids every 15-20 minutes);
- being aware of medications and drugs that affect heat tolerance – medications like sedatives, tranquilisers, antidepressants, amphetamines, antispasmodics, diuretics and those affecting blood pressure can interfere with heat tolerance. As such, medical advice should be sought if you are taking these types of medications and are required to work in a hot or humid environment. Alcohol and caffeinated drinks are diuretics which can increase dehydration so they should be avoided if working in hot or humid conditions;
- keeping in good physical condition – physically fit people adapt to and tolerate heat better than people who are not physically fit.

Noise

Large numbers of machines, increased machine speeds and the high density of machinery at the workplace can lead to exposure to excessive noise. Exposure to excessive noise levels can cause hearing loss, annoyance, interfere with communication and reduce

personal performance. Intermittent noise levels, like the closing of presses are not capable of causing noise-induced hearing loss. However, they are known to cause stress and other health effects in some cases. These health effects can include increased blood pressure, ringing in the ears, irritation and an increase in the incidence of stomach ulcers.

Noise is unwanted or harmful sound and is measured in decibels (dB for short). Excessive noise levels occur at or above a determined level of decibels. Noise above this level can lead to temporary or permanent hearing damage. The Workplace Health and Safety Regulation 1997 sets excessive noise as a level of noise above:

- the equivalent of 8 hours continuous exposure to 85dB(A) (this is referred to as $L_{Aeq,8h}$); or
- a peak level of 140dB(C) for any period of time (this is referred to as the $L_{C,peak}$).

By setting the standard as an equivalent of 85dB(A) over 8-hours, the higher the level of noise, the less time a person can be exposed to it. For example, a person exposed to continuous noise levels of 94dB(A) will have received their daily noise exposure after just one hour. This is because sound pressure doubles with every 3dB(A) increase. Also, people working shifts longer than eight hours will have a lower level of noise they can safely be exposed to. For example, a person working a 10 hour shift can only be exposed to an equivalent of a continuous 84dB(A).

Noise levels are also be considered to be excessive if for any period of time, noise levels exceed 140dB(C). Sound above this level is capable of causing immediate hearing damage.

The only accurate way to determine noise levels in the workplace is to have noise monitoring performed by a specialist. However, as a simple test, if you answer “yes” to any of following questions, then a noise risk may exist at your workplace:

- Do you or any of your employees have to raise your voice to a person less than 1 metre away so you can be heard at work?
- Do you or any of your employees experience ringing in the ears either after work or after a particular job?
- Do you or any of your employees have to turn up the volume on the TV, radio or car stereo after a day at work?
- Do you or any of your employees often have to ask people to repeat something they have just said?

If noise levels are above the exposure standard (or you suspect they are above the exposure standard) controls should be implemented to minimise people’s noise exposure. There a number of engineering options for reducing exposure to noise at the source.

These include:

- eliminating or replacing noisy machines with quieter ones
- modifying noisy equipment to reduce the noise generated (e.g. replacing metal components with plastic)
- positioning noisy equipment away from other work areas
- adding noise barriers, noise enclosures, dampening devices to equipment and buildings

- separating noisy machine parts from the basic machine e.g. relocating pumps, fans, air compressors etc. outside the building

By reducing the amount of noise produced at the source people's noise exposure is permanently reduced and you do not need to rely on people adopting appropriate behaviours (e.g. wearing hearing protection).

If these controls aren't possible, administrative control measures may help reduce noise exposure. Examples of administrative controls include:

- organising schedules so that noisy work is done when as few people as possible are present
- regularly maintaining plant and equipment. Badly worn bearings and gears, poor lubrication, loose parts, unbalanced rotating parts, and steam or air leaks can result in higher noise levels
- notifying people in advance when noisy work is to be carried out so they can limit their exposure to it
- keeping people out of noisy areas if their job does not require them to be there
- providing quiet rest areas for food and rest breaks
- limiting the time workers spend in noisy areas by moving them to quiet work areas before their daily noise exposure levels are exceeded
- job rotation – changing the variety and length of tasks performed by workers so they are not constantly exposed to excessive noise
- training workers in safe work practices and the use and maintenance of personal protective equipment

If engineering controls and administrative controls can't be implemented or they don't reduce workers exposure levels enough, you may need to rely on personal protective equipment. The two types of PPE available for noise exposure are ear muffs and ear plugs. However, there are a wide variety of these types of hearing protectors available. The selection of hearing protection should be based on:

- The degree of protection required. Generally, the higher the noise exposure the higher the attenuation rating should be. However, wearing hearing protection that blocks out too much noise can impair a person's ability to hear alarms and warnings.
- The suitability of the hearing protection to the work environment. For example, ear plugs may not be suitable if people are inserting them with dirty hands. This could increase the risk of ear infections. For these jobs ear muffs may be more appropriate.
- The comfort and fit of the hearing protection device for the user.

To ensure hearing protection devices continue to provide adequate protection they should be regularly inspected to make sure they are in good condition. Also employers should provide their employees with information and training about the need for hearing protection and the correct use and care of these devices.

Boilers

Boilers are used in drycleaning workplaces to provide steam and heat for a range of applications. However, failure of a pressurised boiler can have catastrophic consequences

resulting in serious damage to people and property. Lack of effective maintenance and inspection can allow a dangerous condition to go largely undetected.

What to Do:

It is essential that effective maintenance and inspection programs are in place to make sure dangerous situations are avoided or detected early. This program should:

- include procedures for the safe operation, inspection and maintenance of all boilers
- specify the maximum period of time between inspections of the interior and exterior of the boiler and all safety fittings
- include documented safety procedures to be followed for inspection and maintenance
- set out what needs to be done during inspections
- make sure records are kept of maintenance and inspections carried out
- make sure all inspections and maintenance is performed by a competent person

Manufacturer's instructions and operating manuals will give guidance for specific boilers, with detailed directions relating to safety checks. There are several Australian Standards that also give guidance on when and how inspections and maintenance should be performed on boilers. Some of the items that should be checked regularly include:

- gauges and control equipment (e.g. low water indicator)
- pressure relief valves
- pumps and valves
- water quality and treatment methods
- burner and fuel systems (e.g. automatic fuel cut out on flame failure)

Clear directions should also be provided on:

- safely starting-up, running and shutting down the boiler
- frequency of water tests and blowdowns
- what to do in high and low water conditions
- what to do in an emergency

Special care needs to be taken when cleaning fuel oil burners. This is because soot and scale builds up over time and these can contain lead. Both the soot and the lead in the soot are potentially hazardous. Some ways of minimising the likelihood of people being exposed to soot and scale include:

- using vacuum suction to remove loose soot or scale
- wetting adherent soot or scale where possible
- thoroughly hosing the entire boiler to remove any residual soot or scale
- washing all equipment used during cleaning
- not eating, drinking or smoking while contaminated with the soot or scale
- removing and washing all work clothes worn during cleaning prior to wearing them again
- putting all disposable items used during cleaning in a sealed plastic bag for disposal
- thoroughly showering, including washing the hair and cleaning fingernails when cleaning is finished

It is also essential that any person who is required to operate, make adjustments to or maintain a boiler at a drycleaning workplace has the appropriate training and certification as a boiler operator. Additionally, because the failure of a boiler could result in a catastrophic event and result in the death or injury of workers and members of the public you may be required to register your boiler with Workplace Health and Safety Queensland (WHSQ). Contact WHSQ for further information about the registration process.

Electricity

Electricity is a potentially lethal energy source that needs to be managed appropriately to prevent injury and illness. Electrical accidents are usually caused by:

- unsafe equipment;
- improper installation of equipment;
- unsafe work practices; or,
- a combination of the above.

In the drycleaning industry, there are a number of steps that can be taken to minimise the risk of injury and illness from electricity. These include:

- having electrical equipment (e.g. washers, irons etc.) and electrical installations (e.g. switchboards, safety switches, wiring) regularly serviced and maintained;
- keeping extension cords and electrical leads away from sources of damage such as water, heat and mobile plant (e.g. keep them away from water or chemicals; don't let leads get run over by forklifts, trolleys or pedestrians). If leads need to be in areas where they might suffer damage, make sure they are protected;
- turning power off immediately if water is present where electrical equipment is being used;
- encourage people to report faulty electrical equipment immediately (e.g. cords are frayed or bare wires are exposed; smoke coming out of the equipment; electrical equipment cuts out for no obvious reason);
- removing faulty electrical equipment from service immediately until it has been inspected/repaired by a qualified electrician;
- having guards designed to cover live electrical parts of equipment in place before electrical equipment is turned on (especially after it has undergone maintenance or repairs).
- only use suitably designed explosion protected electrical equipment in areas where a flammable atmosphere might exist (e.g. chemical storage areas). Contact the Electrical Safety Office on 1300 650 662 for more information.

Safety Switches

It is also good practice to have safety switches installed to protect people from electric shock. Safety switches are devices designed to monitor the flow of electricity and immediately cut the electricity supply when current is detected leaking from faulty switches, wiring or electrical equipment. This prevents the current flowing through a person to the earth and giving them an electric shock.

However, safety switches are not failsafe and need to be regularly inspected and tested to ensure they are functioning correctly. There are two types of tests that should be regularly conducted on safety switches to check if they are functioning correctly. These are:

- **pushing the in-built test button** – have someone at the workplace regularly (e.g. every 6 months) push the in-built test button of each safety switch to make sure it trips properly. This should be done outside operating hours as it should turn the power off; and,
- **inspection and testing by a competent person** (e.g. an electrician) – have a competent person regularly (e.g. every 12 months) inspect and test your safety switches to make sure they are functioning correctly.

5. Other Workplace Health and Safety Issues

Slips, trips and falls

Slips, trips and falls are one of the most common causes of injury in the drycleaning industry. Slips, trips and falls are often not taken seriously, but can result in serious injury and these risks need to be managed effectively.

To reduce slips in your workplace, consider:

- increasing the slip resistance of flooring, ramps and slopes by:
 - installing slip resistant flooring surfaces and coverings
 - applying treatments such as sand-blasting, coatings or acid etching to existing floor surfaces
- repairing leaking equipment such as drycleaning machines, washers and dryers to prevent liquids getting onto the floor
- capturing leaking oil, solvent or water from machines (e.g. using drip trays or installing moisture barriers around the machine; spill trays should be installed on all drycleaning machines)
- using mats at entrances that stop water being tracked inside on rainy days
- having procedures in place to clean up spills, leaks and waste
- regularly cleaning the floor (perform wet cleaning outside of work hours or dry off surfaces before pedestrian traffic is allowed in the cleaned area)
- providing workers with appropriate footwear

Trips can be minimised by:

- clearly marking walkways and making sure garments, equipment and waste are not put in these areas
- providing enough storage space to keep garments, equipment and waste out of walkways and work areas
- supporting electrical leads and air hoses overhead to keep them off the floor
- hardwire equipment in to minimise electrical leads on the floor
- making sure damaged floors and walkways are repaired
- using ramps instead of steps where floor levels change
- making sure there is good lighting
- painting the edges of large pieces of equipment in a bright colour to make them more visible

Reducing injuries from falls can be done by:

- fitting railings to mezzanine floors and raised storage areas
- making sure that when someone has to work from a ladder the person has three points of contact with the ladder or a stable object at all times and secure the ladder to prevent it moving
- not using step ladders to get up to another surface (e.g. a mezzanine floor)
- maintaining equipment such as ladders to prevent failure
- providing anti-slip surfaces on steps and rungs
- making sure people wear footwear with adequate slip resistance, suitable for their work and the environment
- providing adequate lighting so that people can move around and do their jobs safely (e.g. consider brightness, glare, shadows etc.)

Cooling Towers

Where an air conditioning system is installed with a cooling tower or evaporative condenser, Legionella bacteria can grow in the water of the system, under certain circumstances. When this Legionella contaminated water is dispersed into the air it can be inhaled by workers, customers or passers-by and potentially lead to an outbreak of Legionnaires' disease.

One of the necessary ingredients for the growth of Legionella bacteria is the presence in cooling towers of nutrients such as sludge, scale, rust, algae and other organic matter. Regular cleaning and maintenance of cooling systems and towers can reduce the amount of these nutrients and limit the growth of Legionella bacteria. Cooling tower cleaning procedures should:

- include disinfection, cleaning and re-disinfection
- include all wet surfaces in the cleaning process
- be carried at least once every 6 months by a competent person who is familiar with the relevant Australian Standards.

Some additional controls that prevent the growth and distribution of Legionella bacteria include:

- having cooling towers fitted with bleed arrangements to control dissolved solids
- having cooling towers dosed with water treatment to control scale, corrosion and bacteria via an automated dosage system
- having cooling towers fitted with a drift eliminator
- monthly inspection and servicing of the cooling tower by a competent person
- monthly testing of total bacteria counts to evaluate the effectiveness of cleaning and water treatment processes.

Most cases of Legionnaires' disease have been traced to contaminated water in cooling towers. As such converting to an evaporative or refrigerated cooling system can greatly reduce the risk of Legionella bacteria growing and being distributed throughout your workplace.

Due to the risk of cooling towers being the source of an outbreak of Legionnaires' disease, you are also required to register your cooling tower with WHSQ.

Burns

Many operations in the drycleaning industry involve contact with hot items. Burns of the hands and upper limbs may result from handling hot clothing items, steam emission and direct contact with hot equipment. As well, chemical burns can also occur. The section on hazardous substances above covers issues associated with the use and storage of hazardous substances.

Control Measures

Appropriate control measures, work practices and policies should be put into place to manage the risk of people receiving burns. These may include:

- using automatic presses instead of manually operated presses;
- restricting access to heat generating plant, such as boilers

- installation of lagging or guards on all accessible parts of plant which might cause burns, for example, steam pipes, irons, presses;
 - installation of ventilation systems to dispel steam where practicable;
 - systems for regular maintenance and servicing of plant;
 - information, instruction, training and supervision of employees on safe work practices;
 - systems for the safe use of chemicals, for example:
 - installation of an automatic feeding system for liquid chemicals,
 - procedures for managing chemical spillages,
 - provision of appropriate personal protective equipment as described in the material safety data sheet;
 - provision of emergency showers and eyewash facilities in chemical handling areas;
 - provision of fire fighting equipment and procedures; and
- provision of first aid facilities and trained first aid personnel. For more information on first aid refer to Section 3 of this guide.

Lighting

Lighting assists employees to identify and recognise hazards in the workplace, reduces eyestrain and takes away the necessity to adopt poor posture to see properly. Lighting can therefore be an important health and safety factor at the workplace and can often be overlooked by employers. The employer should consider lighting at work by adopting a three step approach:

1. designing the workplace to avoid lighting problems;
2. identification and assessment of any lighting problems and difficulties; and
3. the development of solutions and their evaluation.

AS1680 Interior Lighting Part 2.0: Recommendations for specific tasks and interiors gives standards of illuminance for common tasks in the drycleaning industry. An initial level of illuminance should allow for the progressive loss of light which will occur over time. This loss would occur as the source of light for example a light bulb, deteriorates. The following table gives some illuminance values for various tasks in the drycleaning workplaces.

Type of task or interior	Maintenance Illuminance lx
Drycleaning, bulk machine work	160
Receiving and dispatch	240
Ironing and pressing	400
Sorting and checking	400
Mending and spotting	600

APPENDIX 1: Example of a Health and Safety Policy

The business/company considers its responsibility for Workplace Health and Safety to be the equal of other key business goals. The business/company will take the steps required to maintain safe working conditions for all employees. To achieve this policy, specific responsibilities as detailed below are required.

(Business name) will -

- ✎ Provide safe working conditions, procedures and facilities which comply with relevant legislation and regulatory standards.
- ✎ Ensure the business's safety rules and practices are effective and appropriate.
- ✎ Provide opportunity, through consultation, for safety-related matters to be identified and resolved.
- ✎ Provide first-aid, medical, health and rehabilitation services.

Owner/Operator will -

- ✎ Identify and reduce all hazards that may produce injury and illness.
- ✎ Involve employees in workplace health and safety matters, and consult with them in the ways to reduce workplace hazards.
- ✎ Comply with statutory authorities and confer with government bodies, industry groups and trade unions to develop strategies for monitoring health and safety objectives.
- ✎ Provide appropriate training in workplace health and safety.

Employees will -

- ✎ Have a working knowledge of company rules, regulations and practices.
- ✎ Work safely and maintain a safe workplace.
- ✎ Ensure that before they start a new job they know how to do it safely.
- ✎ Report any hazard to their supervisor.
- ✎ Wear protective equipment in designated areas and for designated tasks.
- ✎ Abide by any safety warning sign including danger tags.

Owner/Operator

Date

APPENDIX 3: Hazardous Substances Risk Assessment

Only required for chemicals that are listed as Hazardous Substances

The chemical's label and Material Safety Data Sheet (MSDS) will be needed to complete the risk assessment.
 References: Workplace Health and Safety Regulation Part 13; the Hazardous Substances Code of Practice 2003

Name of Substance: _____
 (or name of the substances if using a mixture)

How is the substance used? - i.e. describe the process? (If the chemical is used for a number of different processes a risk assessment may be needed for each task. Also consider decanting, storage & disposal)		
How are people exposed to the substance? (Tick or mark applicable routes or entry)	Skin (splashed onto or absorbed through):	
	Eyes (splashed onto or absorbed through):	
	Inhalation (breathed in):	
	Ingestion (swallowed):	
How much of the substance are workers exposed to during the task? (eg: in litres / millilitres)		
For how long are workers exposed to the substance? (How often is the chemical used. eg: in hours per day and days per week)		
Briefly, what are the health effects of exposure to this substance? (Refer to the MSDS)	Skin:	
	Eyes:	
	Inhalation:	
	Ingestion:	
What engineering control measures (eg: extraction ventilation; dilution ventilation) are recommended by the MSDS and/or label?		
Currently, what engineering controls are used to control exposure to the substance?		
If engineering controls are used, are they maintained and checked for effectiveness? (Give Details)		
What Personal Protective Equipment (PPE) is recommended by the MSDS and/or label?	Skin:	
	Eyes:	
	Inhalation:	
Currently, what PPE is used? (Give Details)	Skin:	
	Eyes:	
	Inhalation:	

<p>Are any other control measures (eg: procedures, rotation of people, using substance after hours to minimise how many people are exposed, etc....) recommended by the MSDS and/or label?</p>																			
<p>Are any other control measures currently used at the workplace?</p>																			
<p>What is the level of risk from use of this hazardous substance (select one)?</p> <ol style="list-style-type: none"> <u>Risks not significant and not likely to increase in the future</u> <u>Risks are significant but effectively controlled (but could increase in the future)</u> <u>Risks are significant and not effectively controlled</u> <u>Uncertain about the risks</u> (Conduct air monitoring and/or health surveillance [see below] or obtain further information and advice) 	<p>Level of risk:</p> <p>Explanation of why this risk level is chosen:</p>																		
<p>Does air monitoring need to be done? <i>You can have air monitoring done to:</i></p> <ul style="list-style-type: none"> find out how much your employees are being exposed to find out if the controls being used are adequate to ensure employee's health and safety is protected 																			
<p>What control measures will be implemented? <i>(The best type of control is by elimination; however other types of controls can be used).</i></p> <p style="text-align: center;"><u>Hierarchy of Control Measures</u></p> <p><u>Elimination</u> (MOST EFFECTIVE) <u>Substitution</u> (with a less hazardous substance) <u>Engineer out the hazard by isolation</u> <u>Engineer out the hazard by ventilation</u> <u>Administrative controls</u> (rotation, procedures etc) <u>PPE</u> (especially respiratory protection) (MOST EFFECTIVE) (LEAST EFFECTIVE)</p>	<p>Give details (if any):</p>																		
<p>Is health surveillance required? Health surveillance is required if:</p> <ul style="list-style-type: none"> Someone has an adverse effect from a hazardous substance at work and there is a way to detect signs of the health effect; or: The level of risk (from question 14) is significant <u>and</u> the substance contains (or is) one or more of the following: <table border="0"> <tr> <td>• 4,4' Methylenebis (2-chloroaniline) (MOCA)</td> <td>• Creosote</td> <td>• Pentachlorophenol (PCP)</td> </tr> <tr> <td>• Acrylonitrile</td> <td>• Crystalline silica</td> <td>• Polycyclic aromatic hydrocarbons (PAH)</td> </tr> <tr> <td>• Asbestos</td> <td>• Inorganic arsenic</td> <td>• Thallium</td> </tr> <tr> <td>• Benzene</td> <td>• Inorganic chromium</td> <td>• Vinyl chloride</td> </tr> <tr> <td>• Cadmium</td> <td>• Isocyanates</td> <td></td> </tr> <tr> <td></td> <td>• Organophosphate pesticides</td> <td></td> </tr> </table> <p><small>(Refer to section 109 of the Queensland Workplace Health and Safety Regulation 1997)</small></p>	• 4,4' Methylenebis (2-chloroaniline) (MOCA)	• Creosote	• Pentachlorophenol (PCP)	• Acrylonitrile	• Crystalline silica	• Polycyclic aromatic hydrocarbons (PAH)	• Asbestos	• Inorganic arsenic	• Thallium	• Benzene	• Inorganic chromium	• Vinyl chloride	• Cadmium	• Isocyanates			• Organophosphate pesticides		
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• Asbestos	• Inorganic arsenic	• Thallium																	
• Benzene	• Inorganic chromium	• Vinyl chloride																	
• Cadmium	• Isocyanates																		
	• Organophosphate pesticides																		

18. Date: _____ 19. Review Date: _____

20. Person/s conducting risk assessment:

APPENDIX 5:
**Employees acknowledgment of
Work Place Health and Safety requirements**

General information:

Employers have the major role in ensuring that the workplace is a safe environment and that the workforce is able to safely carry out their tasks. Although this is the law, employers are conscious of their responsibility and all efforts are taken to ensure work areas are safe.

We realise accidents may happen; however by ensuring machinery is well maintained and policy guidelines are followed we can reduce them to an absolute minimum.

Obviously accidents do not happen on purpose, but statistics show about 90% of all industrial accidents are as a result of the actions of people, only 10% to machinery. By following some simple rules we can hopefully drastically reduce the chance of an accident happening.

If you do injure yourself at work you must notify your supervisor at the time of injury. Your supervisor will ensure that the necessary medical action is taken and that appropriate forms are completed. Corrective action will be taken to ensure the accident does not occur again.

There are a few common sense dress rules that apply for safety sake. Be aware of loose fitting garments and long hair that may get caught in moving machinery. Footwear must also be adequate, footwear with an open toe area is not allowable.

I,.....of.....
.....

acknowledge that I clearly understand the general information above and have been handed a copy of the Work Place Health & Safety Manual. I have watched the Work Place Health & Safety induction DVD and clarified with my supervisor/employer any questions that I may have had regarding my obligations.

.....
Signed (employee)

.....
Signed (employer/supervisor)