

# **GUIDANCE TO SUPPORT THE DEVELOPMENT OF CORONAVIRUS (COVID-19) SAFETY PLANS FOR THE WAREHOUSING AND DISTRIBUTION CENTRE INDUSTRY IN NEW SOUTH WALES**



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## 1.0 PURPOSE & BACKGROUND

- 1.1.1 These Guidelines have been adopted and agreed by the major supermarkets and unions as set out in section 5.0 of these Guidelines. These Guidelines will be periodically updated to reflect material changes and advice resulting from Government announcements, health directions and best practice. All parties to this document will be consulted before any new version of the guidelines are issued and requests for amendments/updates will be made through the Working Group. This has been a collaborative effort on behalf of all participants.
- 1.1.2 These Guidelines have been produced by a Working Group consisting of: Coles, Woolworths, Metcash, Aldi, Harris Farm, United Workers Union, Shop Distributive and Allied Employees' Association, and representatives from NSW Health, SafeWork NSW, and NSW Department of Primary Industries. It is the intention of the working group and the broader industry group that the consultation process that has led to the development of these Guidelines will be on-going while the pandemic is a threat, in order to: share best practice and technology; share experiences around confirmed cases and close contacts; suggest amendments and revisions to these Guidelines; other matters related to the COVID-19 pandemic.
- 1.1.3 The purpose of these Guidelines for the Warehousing and Distribution Centre (DC) industry in NSW, is to:
- provide risk-based direction to employers and workers
  - outline the steps to be taken to best provide a safe and healthy environment in view of the coronavirus (COVID-19) pandemic, and
  - identify the action available in the event of interruption to warehousing and distribution centres, as a result of the COVID-19 pandemic.
- 1.1.4 These Guidelines incorporate guidance issued by NSW Health and SafeWork NSW as well as best practice developed across industry and Australia during the pandemic.
- 1.1.5 Compliance with these Guidelines is strongly recommended as the standard set by the industry. However, every element is not mandatory and the Guidelines do not supersede any directions given by NSW Health, SafeWork NSW, or the NSW Government, each which take precedence over this document to the extent of any inconsistency.
- 1.1.6 Individual worksites are diverse and vary in complexity. To allow for flexible interpretation of these Guidelines, it is recommended that employers apply a risk-based approach and implement reasonably practical controls based on the environment and specific hazards at each site.
- 1.1.7 These Guidelines and applicable COVID-19 Safety Plans form part of the development of a safe system of work. However, duty holders have other obligations under the Work Health and Safety (WHS) Act and associated Regulations that they must continue to meet. Workers, employees and contractors must also comply with their obligations under the WHS Act.
- 1.1.8 There is often more than one business or undertaking which may have responsibility for health and safety matters in a workplace. Each Duty holder should exchange information to establish responsibilities, to achieve a cooperative, coordinated management of risk identification and management

- 1.1.9 Many DCs and warehousing workplaces interact with a range of service providers such as delivery drivers and contractors. Each duty holder must consult, co-operate and co-ordinate activities such as cleaning and physical distancing requirements, so that everyone who enters the site understands what is required. Duty holders also need to have arrangements in place to advise each other promptly when there is a suspected or confirmed case at the workplace.
- 1.1.10 Employers must, to the extent it is reasonably practicable, consult with workers who are, or are likely to be, directly affected, in making decisions about the procedure to resolve health and safety issues, the procedures around health and safety consultation itself, the procedures to monitor the health of workers and the conditions of the workplace, and procedures to provide information and training to workers.
- 1.1.11 Consultation does not need to occur through a physical gathering. However, Employers must consult with workers during every stage of the risk management process, including decisions about controls used in the workplace to manage risks of exposure to COVID-19.
- 1.1.12 Following these Guidelines is necessary to support compliance with regulatory requirements and to minimise the need for more stringent measures such as the closure of a site.
- 1.1.13 DCs are critical worksites for food security and every effort should be taken to ensure that they continue to operate in accordance with these guidelines. No site or workforce should be required to shut down, unless specifically required and instructed by NSW Health or otherwise in accordance with law. For clarity, workforce isolation or following the response actions set out in these documents does not equate to site or workforce shutdown.
- 1.1.14 The Guidelines generally and to the extent practicable apply to all personnel attending a warehouse or distribution centre, whether management, staff, employees, labour hire, contractors or service providers. For example, transport service providers are subject to most, but not to all requirements applicable to distribution centre workers and their operations are subject to separate transport guidelines. Similarly, essential contractors, maintenance and safety staff are subject to most requirements applicable to distribution centre workers but may visit multiple sites where necessary.

## 2.0 CONTROLLING RISKS ON SITE

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

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

- the requirements of public health laws
- how workers travel to work, including travel restrictions
- access to childcare and schooling, including school closures, and
- rates of COVID-19 in the surrounding community.

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

Employers should also take into account existing WHS risks in their workplace, and the measures already in place to address those. The employer should:

- assess if these existing measures and controls need to be adjusted
- consider new WHS risks introduced by implementing additional measures to manage the risks of COVID-19 – for example the impact of working in a mask in hot weather
- plan and implement measures to address these new risks, and
- review this assessment regularly to ensure measures continue to be sufficient and whether any new risks have arisen.

Changes to work, systems of work or conditions at work may lead to the introduction of other risks, including psychological or manual handling risks, or result in previously controlled risks no longer being adequately controlled. Each change should undergo a risk assessment.

For example, risks arising from:

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

Finally, in selecting controls, employers must have regard for the way the virus is spread, the duration and kind of contact people will have in the workplace.

## **Control Measures**

Based on risk assessments, a combination of the measures below should be implemented where practicable, together with those required by the health directions, to assist in providing a safe and healthy environment at work.

- 1) Screening workers coming to site including surveillance testing
- 2) Workplace Mapping / Tracing
- 3) Physical Distancing
- 4) Bubbles and Workplace Separation
- 5) Personal Hygiene & Cleaning
- 6) Ventilation
- 7) Shared Tools, Plant and Equipment
- 8) Regular Environmental Cleaning and Disinfecting
- 9) COVID-19 Marshal
- 10) Personal Protective Equipment
- 11) Inspections
- 12) Single site employment
- 13) Travel
- 14) General Communications
- 15) Vulnerable workers
- 16) Other measures
- 17) Vaccination

## **Escalation and de-escalation plans**

Employers should prepare and publish for the workforce plans that address the Control Measures, as set out in these guidelines, that are planned to be in place in particular circumstances such as where:

- there have been no locally acquired COVID-19 cases for the prior 28 days
- a small number COVID-19 cases have been identified in the local community (e.g. <14 in the prior 14 days and <5 unknown source cases)
- a minor outbreak of COVID-19 has occurred in the local community
- a widespread outbreak of COVID-19 in the local community or cases connected to the DC or warehouse

In developing escalation / de-escalation plans, consideration may be given to the need to limit operational changes during busy peak periods, provided that commercial pressure must not compromise any safety response.

Escalation / de-escalation plans will in all cases be subject to all applicable regulatory requirements and any minimum standards set out in these guidelines.

A template escalation / de-escalation plan is provided as Appendix 1.

## 2.1 Screening workers coming to site

- 2.1.1 To minimise the risk of transmission of COVID-19 on site, employers should consider implementing a daily screening process.
- 2.1.2 If a worker is experiencing symptoms consistent with COVID-19 or had contact with a confirmed case, they must:
- not attend work and not be permitted (as far as possible) to enter the workplace
  - contact their employer for further advice and;
  - not return to work until they have been tested and return a negative result.
- 2.1.3 Further detail on requirements for cases, close contacts and casual contacts is available on the NSW Health website at <https://www.health.nsw.gov.au/Infectious/covid-19/Pages/isolation-guidelines.aspx>
- 2.1.4 Prior to the start of their shift but before they enter the premises workers should be asked to confirm whether, to the best of their knowledge the worker:
- a) is experiencing any symptoms consistent with COVID-19 (fever, chills or sweats, cough, sore throat, runny nose, tiredness, shortness of breath); or
  - b) has been directed to isolate (in which case, they must not be permitted to work); or
  - c) has been in contact with anyone who has COVID-19 that is not known to their employer; or
  - d) has anyone in their household who has symptoms consistent with COVID-19; or
  - e) has been in contact with anyone who is currently being tested for COVID-19 that is not known to their employer; or
  - f) has been carpooling to and from work with someone other than a resident of their own household who works on a different shift or bubble work group;
- If a worker informs their employer that the answer is “Yes” to a) - c) in 2.1.3 they will not be able to work and, where appropriate, will be directed to a testing site and asked to isolate.
- If the worker informs their employer that the answer is “Yes” to d - ) f), further assessment will be required before entry. Declaring multiple worksites or employers may require the worker to be tested and/or self-isolate before coming onto the site.
- 2.1.5 Employers must adopt additional screening measures to ensure that any team members who are required to undergo regular surveillance testing under public health orders comply with relevant directions and have evidence of a test conducted within the relevant time period prior to commencing work.
- 2.1.6 Screening may, in circumstances of high community transmission, involve the adoption of site based surveillance testing. Further detail is provided in section 3.5 below.
- 2.1.7 The employer must also collect the name, contact phone number, date and time and areas of the work premises attended by any worker or visitor entering. Both this information as well as screening records must be kept for only 28 days by the employer for the purpose of COVID response.

- 2.1.8 QR codes are available from Service NSW for this purpose; further information is available at <https://www.nsw.gov.au/covid-19/covid-safe/customer-record-keeping/setting-up-electronic-check-and-qr-codes>
- 2.1.9 Individual DCs can collect screening and contact information by means that are appropriate to their site, which may include electronic declarations or record collection.
- 2.1.10 Temperature testing is not required or recommended at any DC or warehouse. Temperature checking is not considered a comprehensive control and will only detect a proportion of symptomatic cases where fever is a symptom.

## **2.2 Workplace Mapping and Tracing**

- 2.2.1 In the event of a worker being confirmed as having COVID-19, those who are potentially affected need to be identified as quickly as possible.
- 2.2.2 Employers must implement the Service NSW QR code system and ensure that all site entrants details are recorded using this system. Care should be taken to ensure that the use of the Service NSW system does not compromise any physical or bubble separation.
- 2.2.3 Employers must implement processes or technology to record the schedule, bubbles, teams and work locations for workers to enable mapping / tracing of those who have come into contact with any confirmed case. This may include, for example, the maintenance of rosters or CCTV footage.
- 2.2.4 Mapping/tracing may also utilise contactless or electronic means (such as Bluetooth proximity cards) to obtain this information, the implementation of which is subject to consultation with the affected workforce and/or their representatives.
- 2.2.5 The records collected must include:
  - a) day and time work was undertaken
  - b) time of entry and exit from the premises
  - c) areas of the site where the person attended;
  - d) to the extent practicable, the members of teams that worked together
  - e) to the extent practicable any breaks taken, including time, location and seating

## **2.3 Physical Distancing**

- 2.3.1 Physical distancing should be maintained in accordance with all applicable public health orders.
- 2.3.2 All those on site must maintain a distance of at least 1.5 metres wherever possible and there should be no overcrowded areas.
- 2.3.3 The employer must ensure that all staff that can and/or must work from home, do work from home to the extent required by directions in force. It is accepted that while some leadership positions can work from home, in terms of monitoring work and preventing further WHS risks it may be preferable that those staff attend work on occasions.
- 2.3.4 Movement of workers between sites, or between areas within large sites, should be limited as far as possible to essential work that cannot be performed remotely.
- 2.3.5 Employers must configure communal work areas and publicly accessible spaces so that:
  - a) any enclosed workspace meets any applicable density requirement (e.g. the four square metre rule) set out in public health directions (and preferably more if additional amenity/meal spaces can be created outdoors)
  - b) workers are spaced at least 1.5m apart wherever practicable

- c) If the site has a publicly accessible space, the Employer will also need to erect signage stating the maximum number of members of the public that may be present in the space at a single time.

2.3.6 Employers must consider each work task and whether there is a safe alternative way to undertake the work to increase the distance between workers.

2.3.7 To the extent required to maintain physical distancing requirements, employers should consider and implement most of the following measures as part of a safe system of work:

- a) mark safe distances in work, transit and break areas (e.g. on floors and walls).
- b) adjust start times, breaks and finish times to avoid congestion in high traffic areas and minimise workers coming into contact with each other as they move around the site.
- c) adjust traffic flow in aisles and consider making aisles one way for pickers
- d) instruct pickers not to pick over each other but wait at a suitable distance for their turn and, in consultation with workers, consider updating any KPIs as required to allow for distancing to be maintained
- e) modify the alignment of workstations so that workers do not face each other and that they are adequately spaced from each other
- f) plan for how physical distancing will be maintained during breaks, including for example:
  - i. the use of lunch or crib rooms and amenities
  - ii. the creation of additional dining spaces (including outdoor zones),
  - iii. the removal of excess furniture,
  - iv. the use of barriers with appropriate cleaning
  - v. staggered seating at tables.
- g) spread furniture out to ensure physical distancing measures in common areas.
- h) install temporary physical barriers (e.g. fences, screens) between or within work areas, or between desks, where appropriate. For example, employers should consider installing Perspex guards in high traffic areas with face-to-face contact such as receptions and cafeterias.
- i) avoid carpooling, unless the workers travelling together live in the same household and work in the same bubble
- j) ensure that work vehicles comply with any directions applicable to transport drivers, including limiting occupants, maintaining distance as far as practicable and providing clear instructions for ventilation and cleaning
- k) meetings conducted with physical distancing, using technology or held outdoors or in larger spaces if possible.

2.3.8 Where it appears that it is not possible to undertake work tasks and maintain physical distancing, other control measures need to be discussed and implemented. For example:

- a) minimise the number of worker-to-worker interactions that need to be completed within 1.5 metres.
- b) minimise the number of workers involved in activities that need to occur within 1.5 metres of each other.
- c) provide appropriate PPE, for example respiratory masks or gloves where distance is not able to be maintained.

2.3.9 Where essential work activities need to be undertaken in restricted spaces, the number of workers working in the space should be minimised.

2.3.10 Employers must provide adequate information, instruction and training and prior planning, to ensure that workers maintain physical distancing outside of the work site especially on breaks, at meetings, purchasing supplies or for personal emergencies.

## 2.4 Bubbles and workplace separation

- 2.4.1 The system of work should also limit, as far as practicable, the number of other staff that a team member comes into contact with. To best control the risk of COVID-19 transmission, comprehensive physical separation between team members should be introduced wherever possible.
- 2.4.2 If there is a positive case discovered on site separation between shifts and bubbles created within both the workforce and within each shift will make a difference in the risk assessment that is carried out concerning:
- which areas of the workplace (if any) need to be closed and vacated for cleaning (and for how long) and which need to be deep cleaned;
  - which team members, if any, may need to isolate or seek a test as a close contact or otherwise.
- 2.4.3 Employers should consider creating bubbles by breaking the workforce into smaller operational groups for the site by implementing the following control measures depending on the level of the escalation / de-escalation plan:
- reducing as far as practicable staff working across multiple sites and preventing any non-essential visitors from accessing the site so that a case at one site does not affect another site
  - Cohorting staff to particular shifts and ensuring there is no mixing of staff across different shifts by, for example:
    - adjusting shift patterns to minimise the number of workers onsite (e.g. no overlapping AM/PM shifts).
    - separating shift changes by a reasonable length of time and/or physically separated so that there is no contact between shifts exiting and entering the premises (for example by creating separate entrances and exits).
    - ensuring that, where known and practicable, household members are on the same shift.
  - Creating smaller bubbles within shifts and between teams on site at the same time, such that staff in different bubbles:
    - Have no contact in shared spaces, common areas or amenities. This may be achieved for example by:
      - providing physical separation by building additional outdoor facilities, separate entry paths or separate entry points, separate waiting, amenity, bathrooms and meal areas;
      - separating large facilities such as carparks or canteens with robust physical barriers defining which area a bubble can use and ensuring no overlap; or
      - requiring that staff in different bubbles access amenities only at specified times and ensuring that a clean has occurred between use by different bubbles.
    - Have no contact on the DC or warehouse floor other than where physical distance is guaranteed, for example where team members are utilising large MHE that ensures distance is maintained.

- iii. Where known and practicable, household members on the same shift are in the same smaller workforce bubbles, depending on the state of community transmission and risk assessments.
- d) Bubbles / zones / teams within shifts can be created on a number of distinctions and in accordance with the particular site's needs. For example, bubbles could be created for:
  - i. Team members working in different zones of the distribution centre
  - ii. Team members undertaking different roles e.g. office/admin v floor staff, pickers v loaders, DC staff v drivers etc.
  - iii. Team members with different shift patterns
  - iv. Drivers arriving on site, zones/teams within admin, etc.

Team members in different bubbles should be able to be distinguished, for example by their work areas or by different coloured PPE.

2.4.4 If the measures in 2.4.3 a), b), c) or d) above are implemented comprehensively, this may help reduce the chances of a case in the facility resulting in a large number of close contacts, and therefore enable business continuity. For example, implementing bubbles may result in a decision to not require team members in an unaffected cohort or bubble to isolate or seek a test as a result of the incidence of a positive case in another cohort or bubble (other than in extraordinary circumstances or where there is evidence of transmission between bubbles). Generally, if bubbles are implemented comprehensively and a positive case is identified in only one bubble:

- a) the immediate working group, team or bubble that the positive case worked with and had breaks with will generally be close contacts and should 'stop and stay' pending confirmation from NSW Health;
- b) any individuals who had direct or extended contact with the positive case (identified through CCTV, Bluetooth or other technology) will also be close contacts and should 'stop and stay' pending confirmation from NSW Health;
- c) team members who could have had interaction with the positive case (e.g. different teams that use the same bubble facilities but at different times) may be casual contacts and required to seek a test, but do not need to stop and stay pending confirmation from NSW Health;
- d) team members on different shifts or on different bubbles groupings will not be required to isolate or seek a test, unless there is evidence of interaction and may continue to work.

## 2.5 Hygiene

2.5.1 Good hygiene practices and general cleaning helps with minimising the spread of COVID-19. Good Hygiene includes:

- a) washing hands regularly with soap and water for at least 20 seconds and drying them completely, preferably with clean, single-use paper towels, including before eating and after using the toilet and after touching high touch surfaces such as lift buttons
- b) using an alcohol-based hand sanitiser with at least 60% ethanol or 70% isopropanol as the active ingredient regularly when it is not possible to wash hands
- c) coughing and sneezing into the elbow or a clean tissue and not spitting
- d) avoiding touching the face, eyes, nose and mouth
- e) disposing of tissues and cigarette butts hygienically, for example, in closed bins
- f) not sharing equipment, including desks and PPE, or where this is not possible, equipment being appropriately cleaned between uses
- g) not sharing food and drink or kitchen utensils, and

h) having no intentional physical contact, for example, shaking hands and patting backs.

Employers should review general hygiene requirements and the cleaning regimes in place.

2.5.2 Employers should display health and hygiene information in prominent locations on the DC/warehouse site such as noticeboards in or outside tea rooms, site offices, toilets, foyers and entrances.

2.5.3 Every effort must be made by employers to upgrade personal hygiene and minimise worker to worker contact and all workers must co-operate in all measures to achieve these objectives. These measures must include:

- a) education and information on how to wash and sanitise hands correctly. Promote regular hand washing with soap for at least 20 seconds, especially before and after breaks.
- b) regular use of hand sanitiser, with hand sanitiser stations to be provided at regular intervals throughout each work area of the facility as well as all site entrances including outside lunchrooms and change rooms, together with masks.
- c) provision of sufficient touch free rubbish bins to dispose of paper towels and used masks
- d) communicate to all workers where hand sanitisers are located and encourage their regular use.
- e) education about good cough etiquette (covering your cough and sneeze, or cough into your elbow or shoulder).
- f) education about not touching your nose, eyes or mouth.
- g) provide hand sanitiser and/or hand washing facilities with soap in all site entrances and exits (including entry/exit to communal areas), high touch points, amenities and areas/levels of the site.
- h) ensuring that workers maintain good hygiene if it is necessary to leave the site and return, for example to purchase supplies
- i) ensuring that, where possible, there is enhanced airflow (that windows and air conditioning are set for optimum airflow at the start of each workday or shift).

2.5.4 Employers must ensure that workers have access to appropriate amenities. Employers should review and revise the number and locations of amenities, to reduce movement around the site. A cleaning log sheet which sets out the dates, times and frequency of cleaning is required to be kept in all shared workplaces and updated to include any additional cleaning added in response to the COVID pandemic.

## **2.6 Ventilation**

2.6.1 Limiting the volume of recirculated air will help lower the risk of spreading the virus that causes COVID-19. All internal spaces should be well ventilated and if possible, fresh air should be allowed to flow.

2.6.2 Employers should adjust workspaces and common areas as far as is reasonably practicable to allow additional air circulation and fresh air. This may include, for example:

- a) opening doors or leaving roller doors up to create cross ventilation where possible and where weather permits including keeping lunch room doors open;
- b) moving or duplicating facilities outside;
- c) air conditioning set to achieve strong air movement
- d) any other measures that may increase the flow of air through the DC or warehouse.

2.6.3 Further guidance on ventilation is available at <https://www.nsw.gov.au/covid-19/getting-back-to-work-a-covid-safe-way/ventilation-guidance>

## 2.7 Shared equipment

2.7.1 Workers should avoid the shared use of equipment wherever possible and only use it after it has been sanitised. Where possible staff should be provided with their own personal equipment, labelled with their name.

2.7.2 Where it is not possible to eliminate shared use, the employer should ensure that equipment is cleaned and sanitised between use by different team members. Cleaning wipes must be provided to enable workers to clean equipment between use. For example, by:

- a) regular cleaning of commonly used equipment such as scanning guns and headsets between uses
- b) providing cleaning stations with TGA approved or SafeWork Australia recommended disinfectants for cleaning of shared tools, plant and equipment prior to use in the warehouse.
- c) adding the need to clean and disinfect shared tools and equipment prior to use to prestart checklists and provide training must be provided to the team members on this.
- d) providing cleaning products (e.g. alcohol spray or solution) where communal tools, plant (trolleys or forklifts) and equipment (such as headsets and comms, microwaves) are located and encourage its use.
- e) keeping cleaning products with tools, plant and equipment as they move around the site.
- f) ensuring all operators thoroughly wash or sanitise their hands before and after every use.
- g) ensuring all parts of tools, plant and equipment (e.g. including handles, handrails, headsets) are wiped down before and/or after use.

2.7.3 The shared use of phones, desks, offices, computers and other devices must also be avoided as far as possible. Where this is not possible, these items should be regularly cleaned, including before and after use.

2.7.4 Employers must either replace high-touch communal items with alternatives or increase cleaning regimes. For example,

- a) swapping shared coffee and condiments for single serve sachets
- b) encouraging workers to bring their own cutlery or utensils or providing contact-limited disposable items
- c) installing no touch amenities such as contactless taps (where possible), rubbish bins and soap dispensers. Where this is not practicable, hand sanitiser (preferably contactless) must be provided after touching amenities.

2.7.5 Uniforms and PPE must not be shared. Guidance on cleaning PPE is provided by SafeWork Australia <https://www.safeworkaustralia.gov.au/sites/default/files/2021-04/cleaning-table-covid19-12-April-2021.pdf>

## 2.8 Regular Cleaning and Disinfecting

2.8.1 Cleaning is defined as:

- **deep cleaning** means a decontamination clean (including disinfection), required when there has been a positive case in the workplace, or a preventative clean (for example nightly) conducted to the same standard.

- **regular cleaning** is **routine cleaning** (including disinfection), that occurs daily of high-touched surfaces and equipment, in between breaks and shifts.

- 2.8.2 The Employer must increase regular cleaning across the distribution centre and ensure that cleaning requirements in all applicable directions are implemented including, for example:
- a) a preventative clean occurs for all areas where workers work daily (usually at night when there are less staff) to the standard of a post case deep clean.
  - b) cleaning and disinfection of amenities and meal areas occurs between shifts and work group breaks
  - c) surfaces are cleaned when visibly soiled
  - d) cleaning and disinfection of equipment that is touched should occur between each shift if used by a single operator or between each use where there are multiple operators;
  - e) routine cleaning (at least four hourly) of 'Frequently Touched Surfaces' i.e. surfaces such as toilets, door handles, stair handrails, light switches, lift buttons, table-tops noting that some Frequently Touched Surfaces will need to be cleaned more frequently
  - f) where practicable, prestart checklists have a cleaning checklist included so that there is assurance that equipment and surfaces have been disinfected.
- 2.8.3 Further guidance on cleaning is available from the SafeWork Australia at <https://www.safeworkaustralia.gov.au/doc/how-clean-and-disinfect-your-workplace-covid-19>
- 2.8.4 Cleaning and disinfecting of surfaces is to be conducted using cleaning products that are either on the TGA approved list or contain an equivalent chemical in accordance with SafeWork Australia advice.
- 2.8.5 Cleaning and disinfecting schedules and scope should be the subject of site consultation and monitoring between site management and health and safety representatives (HSRs) or the WHS Committee. The Employer must identify which products are required for thorough cleaning and ensure that adequate supplies are available on site.
- 2.8.6 Certification of completion of any deep clean and nightly preventative clean must be maintained by the Employer. An example is provided as Annexure 2.
- 2.8.7 Should there be a confirmed case then the area/s of the workplace to be vacated and undergo deep cleaning (if any) will be determined immediately, including the timing of the team members last shift, the last time a preventative deep clean was completed, the areas the team member was in contact with and the outcome of the workplace mapping/tracing. If the worker has not been onsite since the last preventative deep clean occurred, there will not be any requirement to close an area that has been cleaned as part of that preventative deep clean.
- 2.8.8 As soon as the risk assessment has been completed the site manager or their representative will, so far as is reasonably practicable, consult with HSRs about the location/s of the deep cleaning required. When deep cleaning is completed evidence of completion will be given or emailed to HSRs and may be placed on the staff notice board/s.
- 2.8.9 Deep cleaning must be conducted by a cleaning team with expertise in COVID-19 related deep cleaning, overseen by a competent person who can ensure that the process complies with any NSW Health requirements and also manages the risks specific to the site. There is no need to engage private cleaning companies if the employers regular cleaning team are sufficiently trained to conduct a deep clean.

2.8.10 An additional deep clean may be conducted, but is not required, if a worker has been identified as a contact of a positive case, but has not themselves tested positive.

## **2.9 COVID-19 Marshal**

2.9.1 All Distributions Centres and Warehouses should have a COVID-19 Marshal. COVID-19 Marshals may be any worker who is committed to COVID-safe practice and will work cooperatively with other workers, management and HSRs. A person who is an HSR may also be a COVID-19 Marshal but this needs to be managed carefully with a clear understanding that the statutory role of an HSR (representing a designated work group) is a very different role to that of COVID-19 Marshal.

2.9.2 Consideration of the appropriate number of COVID-19 Marshals should be based on the requirements to maintain physical distancing as per 2.3. When acting as a dedicated COVID-19 Marshal, a person should not have any duties unrelated to COVID-19 or the safety of the site. In addition to any rostered COVID-19 Marshal, other staff may receive training and provide support as a COVID-19 Marshal while performing their other duties.

2.9.3 Each COVID-19 Marshal will be appropriately trained in all aspects of COVID-safety and prevention, including understanding the application of any directions to their site and the requirements for safe operation as set out in the site's COVID-19 Safety Plans and escalation / de-escalation plans including entry screening, understanding amended work processes, social distancing, use of PPE, hygiene, cleaning and disinfecting, COVID-safe behaviour throughout the site but especially in lunch rooms and at entry points. The COVID-19 Marshal should understand that they are not an expert or able to offer technical advice, which is the domain of WHS professionals.

2.9.4 The role of the COVID-19 Marshal is to:

- a) promote and monitor compliance with applicable COVID-safe requirements such as no car-pooling (if applicable), physical distancing, wearing of masks, hand washing, adherence to caps on numbers of workers in particular areas and regular disinfection of equipment.
- b) Ensure that there is sufficient material in major workplace languages available around COVID-19 symptoms, testing and income supports if testing or isolation is required, etc.
- c) Assist with and engage in site inductions to ensure new starters know and understand COVID-safe protocols.
- d) monitor that the cleaning schedule of common areas and major work areas is being implemented properly.
- e) to lead by example in showing other workers how to behave safely; for example, how to disinfect equipment, properly wear face masks.
- f) to report issues and non-compliance immediately to site management and make suggestions for improvements in a timely manner to management and HSRs and/or the site WHS Committee.

2.9.5 The role of the COVID-19 Marshal and its responsibility will be set by management in consultation with the HSRs and WHS Committee. It is important that if the role is filled by an HSR that their legislated responsibilities are not compromised by the Marshal role. Equally, it is important that an hourly paid worker (as opposed to a supervisor) is not made to bear the burden of ensuring compliance which is a management responsibility. The role is primarily to advise and educate. In that context, only in an exceptional circumstance (where there is a risk that the behaviour endangers the safety and health of other workers) will the COVID-19 Marshal immediately direct other workers about a breach of the COVID-19 Safety Plan or these Guidelines. In such cases the COVID-19

Marshal will have the authority to advise and direct but management will deal with any failure to comply. However, in most cases the COVID-19 Marshal will usually advise/educate workers and then, if necessary, report the behaviour to supervisors and/or the site manager for further action.

## 2.10 Personal Protective Equipment and Face Coverings

2.10.1 Workers in distribution centres and warehouses workers should wear a fitted face covering or mask (a face mask needs to cover both nose and mouth).

2.10.2 There is no requirement for workers in chilled distribution centres to take further protections over and above the requirements in place for ambient DCs or warehouses, unless determined to be necessary by the employer in consultation with the workers, as set out in an escalation / de-escalation plan or where required by applicable public health directions.

2.10.3 Either cloth masks surgical masks or N95 / P2 masks may be used.

<b>Mask Type</b>	<b>Use Frequency</b>	<b>Cleaning Frequency</b>	<b>Lifespan</b>
<i>Cloth</i>	<i>Multiple</i>	<i>Each day</i>	<i>Fair wear and tear</i>
<i>Surgical</i>	<i>Single</i>	<i>N/A throw out after use or becomes moist or soiled</i>	<i>Single use</i>
<i>N95/P2</i>	<i>Multiple</i>	<i>N95/P2 respirators maybe worn until it becomes hard to breath, the mask no longer conforms to the face or loses its shape or for the duration of a shift of no more than four hours.</i>	<i>Follow manufacturer's instructions</i>

2.10.4 Each employer will provide appropriate masks to any person entering the facility and, where necessary at regular visible points in work areas (usually next to hand sanitizer stations).

2.10.5 Employers will also provide training to staff on the correct use and disposal of face coverings and PPE, and on good hygiene practices and slowing the spread of COVID-19. Employers should have a PPE training plan that aligns with best practice, be multi-format (e.g. infographics and text) and the employer should ensure that this is accessible in relevant workforce languages. The use of pre-existing materials and other guidance is acceptable.

2.10.6 Workers should be made aware that the effectiveness of masks is reduced as they become moist. Masks should be replaced during each shift if they become moist.

2.10.7 In some circumstances it may be a work health and safety risk to wear a face mask while performing certain tasks. For example, driving a forklift where the driver also required to wear prescription glasses which may fog, or for certain maintenance or welding work. However, mere discomfort or inconvenience is not a reason to not wear a face covering.

Exemptions from the wearing of a face covering must only be based on the relevant health directions which may include:

- a) the worker has a physical or mental health illness or condition or disability which makes wearing a face covering unsuitable
- b) the worker is communicating with a person who is deaf or hard of hearing, where visibility of the mouth is essential for communication
- c) the nature of the worker's work means that wearing a face covering creates a risk to their health and safety
- d) the worker is consuming food, drink or medicine
- e) for emergency purposes
- f) where doing so is not safe in that circumstance.

2.10.8 Where masks are required, any worker who finds it difficult to work in a face mask or believes that there is a health and safety risk in wearing one then they should immediately approach their site manager and also report the issue to the HSR for their designated work group. Any exemption on safety grounds must be based on a full risk assessment. However, a worker who is assessed as unable to wear a mask may be deemed to be a vulnerable worker and an employer may have a policy of providing leave or alternative duties after consultation.

2.10.9 Where a worker is exempt from wearing a mask for any reason, employers may require the worker to utilise an alternative face covering such as a face shield where practicable. If an employer requires the use of a face shield or alternative face covering, the employer must provide appropriate shields or coverings to the worker including training in its use.

## **2.11 Inspections**

2.11.1 Inspections of sites may be conducted by NSW Health or SafeWork NSW. Everyone should ensure all measures are in place to ensure compliance. Employers, HSRs and all team members are encouraged to work together to assist NSW Health and SafeWork NSW in this important objective. Any inspections by NSW Health or SafeWork NSW should be adjusted to ensure the maintenance of the bubble and those conducting inspections must wear full PPE to ensure that bubble separation is not compromised.

## **2.12 Single site employment**

2.12.1 To the extent practicable and where required by NSW Health orders, employers must establish a system that ensures that workers are not working across multiple settings/workplaces (except for those limited cases with exemptions such as essential services, e.g. mechanical repairs or IT services).

2.12.2 Workers must, on request, provide a written declaration to the employer that operates a DC or warehouse to advise them that they have worked or intend to work at more than one work premises (where the other workplace is not connected to the employer) and must provide details of the other work premises to the employer that operates the DC or warehouse. Records of other work premises must only be used for the purpose of COVID response and deleted when no longer required.

2.12.3 Employers may, in consultation with workers, choose to impose certain conditions that must be completed before a worker may commence work on a site. Such measures could, for example, include the completion of a negative COVID-19 test or a specified gap following any shifts at another site.

## **2.13 Travel**

2.13.1 Employers should consider and implement measures to avoid carpooling in accordance with applicable health directions. For example, even if carpooling is not prohibited, where

shift or bubble separation is implemented as a control in accordance with 2.4 above, workers should be prohibited from carpooling to and from work unless all those traveling together both:

- (a) work in the same shift or bubble and declared in writing that they are carpooling together; or
- (b) reside at the same location.

2.13.2 Employers must collect and utilise records of team members carpooling only for the purposes of COVID response. Workers must not socialise or mingle in car parks before or after work. If a worker arrives early for work, they must remain in their own car until they proceed to the entry point. Likewise, upon leaving work a worker must proceed directly to their car without socialising and leave the car park as soon as possible. Preferably, car park sections would be reserved for different shifts / bubbles so there is no cross over between shifts in car parks.

2.13.3 When travelling in work vehicles for essential work, staff must adhere to any guidance in relation to hygiene, cleaning and physical distancing provided to the transport industry. It is recommended that:

- a) for single cab vehicles (i.e. a utility or truck), there should only be the driver and one passenger per vehicle, suitably distanced.
- b) in a dual cab, there should only be the driver and one passenger in the front and one passenger in the back per vehicle, all suitably distanced.
- c) all vehicle occupants in a shared vehicle are required to wear a face covering.

2.13.4 Work vehicles, especially those that are shared, should be regularly cleaned to ensure adequate hygiene and protection. Regular users of work vehicles must complete training on COVID-safety, including personal hygiene, social distancing and staying home if unwell. Pool vehicles must be equipped with cleaning products and be subject to a prestart clean, prior to operation.

2.13.5 Truck drivers must stay in their truck, as far as practicable, when delivering at stores or loading at a Distribution Centre or warehouse. If they do alight it must:

- a) be for as short a time as possible and only for essential purposes
- b) be with as little contact with store and distribution centre staff as possible, with records collected in accordance with section 3.2 above.

2.13.6 Where it is company policy that truck drivers are required to alight from the cab for safety purposes during loading/unloading they must move into a driver safety zone during loading or unloading. In this instance, exclusion zones must be in place and social distancing must be maintained. Suitable cleaning and disinfecting must be in place for any surfaces in that zone that may be considered high contact, in accordance with section 2.8 and drivers should not enter the main DC.

## **2.14 General Communication**

2.14.1 Ensuring everyone is informed is fundamental to managing this pandemic and ensuring the safe operations of warehousing and distribution sites.

2.14.2 These Guidelines have been developed to be communicated to all employers, workers and stakeholders. Everyone is urged to regularly promote and adhere to these Guidelines. Each workforce needs to be familiar with their COVID-19 Safety Plan and

these Guidelines – especially the control measures and the reasons why they are important.

- 2.14.3 Signage, posters and workplace voiceovers are ways of communicating what control measures apply in the workplace and the applicable escalation / de-escalation steps.
- 2.14.4 Regular meetings (which may be existing meetings) between employer, HSRs and union delegates to update on variations to the COVID plan, monitor the effectiveness of the plan, and receive feedback from the workforce.
- 2.14.5 It is also important that workers and other persons understand that they are obliged under WHS laws to comply with any reasonable instructions, policies and procedures given by the employer at the workplace, including in relation to physical distancing, hygiene and not coming to work if they have COVID-19 symptoms.
- 2.14.6 Site inductions for all new starts should be updated as required to include information on COVID-19 potential risks and workplace controls that have been implemented in accordance with these guidelines, the COVID-19 Safety Plan and any escalation / de-escalation plan.
- 2.14.7 Toolbox talks should be regularly conducted with appropriate physical distancing and outdoors if possible, ensuring that shift and bubble separations continue to be respected. Through both toolbox talks and other communications workers should be encouraged to put forward practical ideas for changing work practices to avoid the spread of COVID-19. Toolbox talks should also provide clarity to workers on leave arrangements for those that cannot work, and to encourage self-reporting and minimise the spread of risk. They are an opportunity for employers and HSRs to highlight areas for improvement, as well as include updates in line with guidance from NSW Health.
- 2.14.8 Both induction materials and regular communications about COVID-safe practices should be translated into the main community languages of the workforce and made readily available through printed and on-line means.
- 2.14.9 Consideration should also be given to holding specific meetings or providing materials in community languages to ensure that Culturally and Linguistically Diverse (CALD) and Non English Speaking Background (NESB) communities understand the information and the implementation requirements of the workplace COVID-19 Safety Plan.

## **2.15 Vulnerable workers**

- 2.15.1 Certain groups of people may be vulnerable workers in relation to coronavirus based on age or medical conditions. Advice as to those who are risk of serious illness is provided at <https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert/advice-for-people-at-risk-of-coronavirus-covid-19>
- 2.15.2 Employers are to risk assess roles that may have a higher chance of exposure to COVID-19 and implement controls to address these risks for vulnerable workers.
- 2.15.3 Where practical, reasonable action should be taken to reduce exposure for vulnerable workers such as providing the ability to separate from other workers by time or space, work from home or in roles with greater physical distance.

## **2.16 Other measures**

- 2.16.1 Warehousing and Distribution Centre sites are diverse and vary in complexity, employers must apply a risk-based approach and implement reasonably practical controls based on the environment and specific hazards at each DC/warehouse site. In addition to the

measures and controls mentioned in this section, employers should consider other measures for implementation such as:

- a) using alternatives to face to face meetings where practicable,
- b) reducing the length and size of meetings, especially for critical workers, by requiring some or all to dial in,
- c) ensuring working from home arrangements are enabled where feasible,
- d) structuring management teams to ensure contingency in the event of team members needing to be isolated or quarantined at home,
- e) limiting visitors including scheduled services unless mandatory or for safety reasons,
- f) Training conducted online if possible or limit exposure times and provide adequate distancing.

## **2.17 Vaccination**

- 2.17.1 A number of COVID-19 vaccinations have been approved for use in Australia. Vaccination is an important step all individuals can take to protect themselves, their colleagues and family.
- 2.17.2 SafeWork NSW considers vaccination a high order risk control measure. When a COVID-19 vaccine is generally available, businesses may require workers to be vaccinated for COVID-19 if reasonably practicable to do so. A variety of factors such as eligibility for the vaccine, personal health, medical history, type of work and alternative control measures should be considered, along with the risk of exposure. Further information is available at <https://www.safework.nsw.gov.au/resource-library/COVID-19-Coronavirus>
- 2.17.3 Employers, unions, HSRs and delegates should encourage all workers to take up a vaccination suitable for their circumstances as soon as they are eligible.
- 2.17.4 Employers should seek to facilitate prioritised and accessible vaccinations for all workers who attend the worksite, including contractors, casuals and drivers who interact with workers on the site.
- 2.17.5 NSW Health may in the future take differentiated responses in relation to cases of COVID-19 identified at a workplace based on vaccination status. This may include:
  - (1) reduced isolation requirements for workers who are themselves vaccinated; or
  - (2) less restrictive actions for a workplace if a large proportion of workers are vaccinated.
- 2.17.6 To support the NSW Health response, employers should collect records on the vaccination status of workers in a manner that is consistent with privacy obligations and employer's policies. Vaccination information must not be used for any purpose other than COVID-19 response activities. Employers should consult with the workforce as to the appropriate method of collection of vaccination status and should work with unions HSRs and delegates to facilitate the collection of this information for COVID-19 response purposes subject to privacy obligations.

## 3.0 WORKPLACE CASE/INCIDENT PROCESSES

### 3.1 What if a worker has been diagnosed with coronavirus (COVID-19)?

- 3.1.1 If a worker becomes a confirmed case of COVID-19, the worker must not attend the workplace under any circumstances and must isolate at home until they receive clearance from the NSW Health. This is part of the employer's and worker's obligation to ensure a safe workplace.
- 3.1.2 Positive test results should be immediately communicated by the worker to both the employer/operator of the site and the labour hire provider if the worker is engaged through labour hire.
- 3.1.3 Unless advised otherwise, the infectious period begins on the date two days prior to the onset of symptoms or a confirmed COVID-19 diagnosis (whichever comes first), until the day on which the person receives a clearance from isolation from the NSW Health.
- 3.1.4 NSW Health will notify the employer of any case connected to their site. The employer must not wait for contact from NSW Health before taking action in response to the case.
- 3.1.5 As soon as they know about a confirmed case, the Employer must:
- undertake a risk assessment to determine whether any part of work premises in which the diagnosed worker worked must be closed to allow cleaning (if cleaning has not occurred since the case was last onsite) and contact tracing to occur or whether the risk can be managed whilst the work premises (or part of it) continues to operate
  - if the worker has been onsite since the last preventative deep clean was completed, undertake a comprehensive clean of the relevant part of the Work premises in which the diagnosed worker worked in the relevant period, and any high touch areas likely to have been touched by the diagnosed worker in accordance with the guidelines published by SafeWork Australia.
  - consult with the diagnosed worker and examine the employer's own records to determine any close contacts and advise any identified contacts to leave the work premises and stop and stay pending confirmation from NSW Health in accordance with 3.1.12 below.
  - notify all workers when a worker has tested positive and inform all workers (and health and safety representatives) to be vigilant about the onset of symptoms and to be tested if they become symptomatic.
  - contact NSW Health and notify it of the actions taken and any contacts identified
  - notify SafeWork NSW on 13 10 50 of a case of COVID-19 arising out of work. Further information is available at <https://www.safework.nsw.gov.au/resource-library/COVID-19-Coronavirus>.
  - Ensure their workers' compensation insurer is notified within 48 hours (if a work-related injury or illness). Further information is available from the State Insurance Regulatory Authority.
- 3.1.6 NSW Health will notify the employer and provide advice only when the worker has been deemed to be infectious while on-site and where there are necessary actions for a site to take (whether in cleaning or assisting in contact tracing activities). Note that, NSW Health may not contact the employer or require further action if the worker was not infectious or if NSW Health is satisfied with the immediate response completed under 3.1.5.
- 3.1.7 If the employer or union wishes to learn more about the steps to be taken in these events, they can contact 13 77 88, the established Services NSW number.

- 3.1.8 Clear and prompt communication with workers is important in managing a confirmed positive case. As soon as practicable after becoming aware of a confirmed case the site manager (or employer representative managing the situation) must advise the HSRs and designated union officer and / or local delegates that a confirmed case has occurred and provide information as to the date of the positive test, the last day worked, the shift worked and the work area or bubble impacted. Employers should inform HSRs of the positive case in the shorter of:
- a) six hours after the company became aware of the confirmed positive case (or as soon as the information is available); or
  - b) one hour after completing all contact tracing / mapping activities.
- 3.1.9 After communication with HSRs, the site manager or employer representative should make appropriate arrangements to communicate with all workers that a confirmed case has occurred and that staff should be vigilant concerning symptoms of COVID-19. It will be routine to share with all staff information that does not personally identify the positive case, which would include the last shift worked and work area of the confirmed case regardless of the outcome of the contact tracing.
- 3.1.10 NSW Health outbreak requirements will include a mapping/tracing exercise of who the affected worker has had contact with (to determine those who are 'contacts'), and the locations / bubbles where the worker has been on the site. This may include the use of interviews, rosters, CCTV footage or electronic tracing (if used). Evidence of shift separation or the establishment of smaller bubbles within shifts will be particularly relevant to limiting the required scope of the mapping / tracing exercise.
- 3.1.11 The employer should not wait for NSW Health to begin mapping/identification of close contacts. As soon as potential contacts are identified (which may be before or during the mapping / tracing exercise) those contacts should be contacted by the employer and asked to either a) remove themselves from the workplace or b) not attend the workplace. In both cases these workers should remain in isolation until they are either confirmed as a contact or they are cleared from isolation.
- 3.1.12 While awaiting a NSW Health assessment of the case, DCs should presume the following and take the following actions:
- a) the immediate working group, team or bubble that the positive case worked with and had breaks with will generally be close contacts and should 'stop and stay' pending confirmation from NSW Health;
  - b) any other individuals who had direct or extended contact with the positive case (identified through CCTV, Bluetooth or other technology) will also be close contacts and should 'stop and stay' pending confirmation from NSW Health;
  - c) members of other work groups, teams or bubbles who could have had interaction with the positive case (e.g. different teams that use the same bubble facilities but at different times) may be casual contacts and required to seek a test, but do not need to stop and stay pending confirmation from NSW Health;
  - d) all other workers will not be required to isolate or seek a test, unless there is evidence of interaction and may continue to work.
- 3.1.13 It is expected that if these Guidelines are implemented comprehensively that NSW Health will not (unless there are extraordinary circumstances) require the closure of a worksite or DC or determine that workers in separate shifts, cohorts or bubbles are close contacts of a worker in another shift, cohort or bubble.

- 3.1.14 Following identification and interviews with all potential identified contacts, any instructions of NSW Health must be adhered to.
- 3.1.15 Management should endeavour to ask the confirmed case for their consent to divulge their name in a confidential and appropriate way, (but only to the extent necessary in the context of a public health pandemic and the risk to the health and safety of others in the workplace).
- 3.1.16 Privacy considerations are important and personal medical information is protected by legislation. However, there have been statements from Information Commissioners and the Health Complaints Commissioner about exceptions to this rule during a pandemic. The degree of privacy will depend on the circumstances in each case. Usually it will not be necessary to divulge the name of a positive worker to other workers or HSRs because the area the person worked in is clear and the close contacts they had are known. However, in some cases the worker may have had access to all parts of the site and it may be unclear who s/he had contact with over several shifts.
- 3.1.17 It may be necessary to divulge the name of the confirmed case to HSRs confidentially in the process of fulfilling the consultation requirements under the WHS Act and to assure health and safety representatives that site deep cleaning and contact tracing is being undertaken appropriately. The confirmed case's consent must be sought if possible before their name is divulged. In all cases the disclosure of the name of any positive case to HSRs or workers must be done in compliance with all relevant privacy obligations.
- 3.1.18 Positive cases must follow all instructions from NSW Health and remain isolated until cleared in accordance with NSW Health guidelines  
<https://www.health.nsw.gov.au/Infectious/factsheets/Pages/advice-for-confirmed.aspx>  
NSW Health **does not recommend that confirmed cases always be re-tested** after they have been cleared. Evidence consistently shows that cases who have met clinical clearance criteria should not be infectious. However, confirmed cases may intermittently shed fragments of virus for a number of weeks after being infected. This shedding does not reflect infectivity but can cause a positive PCR test that does not create any risk to the worksite.
- 3.1.19 Close Contacts must follow all advice from NSW Health and remain in isolation until cleared. Close Contacts may be tested at Day 12-14 to ensure that they have not developed a mild or asymptomatic infection during their quarantine period. In line with NSW Health guidelines  
<https://www.health.nsw.gov.au/Infectious/factsheets/Pages/advice-for-contacts.aspx>
- 3.1.20 The employer is required to accept any advice and direction of NSW Health regarding any actions required to minimise the risk of transmission which may include the isolation of a broader cohort of staff, further testing including Surveillance/Acquisition Testing and the partial or complete closure of the site for disinfecting and cleaning and the reopening of the site.
- 3.1.21 Employers and workers should also ensure that they take steps to prevent any discrimination against those who have contracted COVID-19, and to prevent any discrimination against those from a particular ethnic background that the employer or workers perceive to be at higher risk of contracting COVID-19. Employers should ensure managers and supervisors have been trained to identify and prevent discriminatory behaviour and that support is in place for workers who feel they are being discriminated against. Employers should ensure policies regarding anti-discrimination and privacy are up to date.

### **3.2 What if a worker is experiencing some of the coronavirus (COVID-19) symptoms but has not been diagnosed?**

- 3.2.2 The symptoms of coronavirus (COVID-19) include fever, cough, difficulty breathing, malaise, fatigue, loss of taste and/or smell, and sputum/respiratory, headache, sore throat, fatigue, shortness of breath, muscle aches, a runny nose, chills, and vomiting.
- 3.2.3 If a worker is away from work and experiences any of these symptoms, they must get tested for Coronavirus as soon as possible, isolate at home and not attend site until a negative test result is obtained.
- 3.2.4 If a worker is at work or onsite and experiences any of these symptoms, the Employer must treat a worker with symptoms as a suspected case and:
- a) direct the worker to travel home immediately (or to a testing centre if a test can be arranged) and provide support to the worker to travel home or the testing centre (or isolate the worker at the work premises while wearing a face covering until the worker can travel home). If isolating at work, the worker must wear a mask and be physically distanced from all other staff persons
  - b) advise the worker to be tested as soon as practicable and to self-isolate while awaiting the test result
  - c) if the worker has been onsite since the last preventative deep clean was completed, take all reasonably practicable steps to clean areas of the work premises used by the suspected case and high-touch surfaces likely to have been frequented by the suspected case
  - d) ensure appropriate records are maintained in order to support contact tracing if the suspected case becomes a confirmed case
  - e) inform all workers (including the health and safety representative/s) to be vigilant about the onset of symptoms and advise all workers to be tested and self-isolate if they become symptomatic.
- 3.2.5 The employer cannot request or direct any worker in self-isolation, quarantine or with symptoms of coronavirus (COVID-19) to attend the workplace.
- 3.2.6 A worker who has developed any of the symptoms can be considered unfit for work and may access paid personal/carer's leave where they have an entitlement. If the test comes back negative, **and** the worker has no symptoms of COVID-19, the worker can return to work.

### **3.3 What if a worker has been identified as having had close contact with someone diagnosed with coronavirus (COVID-19)?**

- 3.3.1 A worker identified as a Primary Close Contact must isolate or quarantine at home in accordance with NSW Health requirements if they have come into contact with a person who is a confirmed COVID-19 case. They may be required by NSW Health to have one or more COVID-19 tests prior to being released from quarantine.
- 3.3.2 Workers who are close contacts must immediately inform their employer and must not return to site until clear from isolation.
- 3.3.3 If a worker becomes a close contact, the Employer must treat the worker as a suspected case and:
- a) direct the worker to travel home immediately (or to a testing centre if a test can be arranged) and provide support to the worker to travel home or the testing centre (or isolate the worker at the work premises while wearing a face covering until the worker

- can travel home). If isolating at work, the worker must wear a mask and be physically distanced from all other staff persons
- b) advise the worker to be tested as soon as practicable and to self-isolate while awaiting the test result
- c) ensure appropriate records are maintained in order to support contact tracing if the suspected case becomes a confirmed case
- d) inform all workers (including the health and safety representative/s) to be vigilant about the onset of symptoms and advise all workers to be tested and self-isolate if they become symptomatic.
- e) if, based on the circumstances of the contact, there is a risk that the worker has been infectious onsite since the last preventative deep clean was completed, take all reasonably practicable steps to clean areas of the work premises used by the suspected case and high-touch surfaces likely to have been frequented by the suspected case that have not already been cleaned since the worker was last onsite.
- f) if, based on the circumstances of the contact, there is a risk that the worker has been infectious onsite (for example, if the close contact lives with a positive case who has been positive for some time), identify any close contacts of the worker (these people are considered secondary close contacts of the case) and exclude them from the workplace until the primary close contact has received a negative test.

### **3.4 What if a worker has been identified as being in casual contact with someone diagnosed with coronavirus (COVID-19)?**

- 3.4.2 A casual contact is defined as a person who has been in the same setting with a confirmed case in their infectious period, but does not meet the definition of a primary close contact
- 3.4.3 A worker who has been a casual contact (as distinct from 'close contact') with a confirmed case of coronavirus (COVID-19), may be required by NSW Health to be tested for coronavirus (COVID-19) in circumstances where it is considered prudent to do so, having regard to the details of the contact and in circumstances where the worker has no symptoms of COVID-19. If a worker is to be tested in these circumstances, NSW Health will advise whether the worker may attend the workplace before a negative test result is obtained.
- 3.4.4 A worker who is a casual contact must immediately inform their employer and may not return to site until they have completed any required testing.
- 3.4.5 If a worker becomes a casual contact, the employer must:
  - a) direct the worker to travel home immediately (or to a testing centre if a test can be arranged) and provide support to the worker to travel home or the testing centre (or isolate the worker at the work premises while wearing a face covering until the worker can travel home). If isolating at work, the worker must wear a mask and be physically distanced from all other staff persons
  - b) advise the worker to be tested as soon as practicable and to self-isolate while awaiting the test result
  - c) ensure appropriate records are maintained in order to support contact tracing if the suspected case becomes a confirmed case
  - d) other than in exceptional circumstances, a worker being designated as a casual contact will not mean any additional cleaning of the workplace is required.

### **3.5 What if a worker has been identified as being a secondary close contact?**

- 3.5.1 A secondary close contact (also known as a close contact of a close contact) is defined as a person who has had face-to-face contact in any setting with a primary close contact from 24 hours after the primary contact's exposure to the case.

- 3.5.2 A secondary close contact may be required to isolate depending on the risk of transmission and the risk of the primary close contact testing positive. Once a primary close contact has tested negative (after the last contact with the secondary close contact) the secondary close contact will generally be cleared from isolation provided that they are able to isolate from the primary close contact. Secondary close contacts should follow NSW Health guidelines available at <https://www.health.nsw.gov.au/Infectious/factsheets/Pages/advice-secondary-close.aspx>
- 3.5.3 A worker who is a secondary close contact must immediately inform their employer and may not return to site until cleared from isolation
- 3.5.4 If a worker becomes a secondary close contact, the employer must:
- direct the worker to travel home immediately (or to a testing centre if a test can be arranged) and provide support to the worker to travel home or the testing centre (or isolate the worker at the work premises while wearing a face covering until the worker can travel home). If isolating at work, the worker must wear a mask and be physically distanced from all other staff persons
  - advise the worker to be tested as soon as practicable and to self-isolate while awaiting the test result and the result of the primary close contact
  - ensure appropriate records are maintained in order to support contact tracing if the suspected case becomes a confirmed case
  - other than in exceptional circumstances, a worker being designated as a secondary close contact will not mean any additional cleaning of the workplace is required.
- 3.5.5 NSW Health may impose additional or modified conditions on contacts returning to work. For example, NSW Health may require workers who are lower risk contacts to conduct daily Antigen tests as a condition of remaining at work. The addition of testing requirements will only allow a contact to be released from isolation if directed by NSW Health.

### **3.6 Other considerations for contacts**

- 3.6.1 If the worker is required to isolate at home, but is otherwise well, the worker and employer may reach an agreement in relation to arrangements for the period of self-isolation including work from home, if this is feasible.
- 3.6.2 A worker may also be entitled to seek further assistance from the measures announced by the Commonwealth or NSW Government.
- 3.6.3 If the worker is concerned about contact with COVID, but has not been required by NSW Health to be tested for COVID-19 and does not have any symptoms of COVID-19 (i.e. fever, shortness of breath, sore throat and coughing), the worker can continue to attend work. Such workers must monitor themselves for symptoms for 14 days from the time after the casual or secondary close contact.
- 3.6.4 Workers should maintain regular communication with their employer/client in relation to their ability to work and to attend the workplace.

### **3.7 Acquisition testing**

- 3.7.1 Where a positive case has been identified in or proximate to the distribution centre or warehouse, NSW Health may request or direct acquisition testing take place to determine whether there has been any hidden transmission connected to the site.

- 3.7.2 Acquisition testing will generally involve all workers who have been in a particular bubble, shift or otherwise connected to the positive case being tested even if they are asymptomatic.
- 3.7.3 NSW Health may require some workers tested as part of an acquisition testing program to isolate until they have received a negative test. NSW Health will usually seek to limit the number of workers asked to isolate on this basis and will, for example, not usually require those in another shift or cohort to the positive case to isolate pending test results.
- 3.7.4 Workers who are tested as part of acquisition testing will not generally be required to isolate after receiving a negative test unless they have been otherwise determined to be a close contact of a positive case.

### **3.8 Surveillance Testing**

- 3.8.1 NSW Health may from time-to-time request that certain DCs, chilled distribution facilities or warehouses participate in asymptomatic Workplace Cohort Testing or Surveillance Testing. This testing involves all or part of the workplace being asked to take a COVID-19 test even though they do not have any symptoms and are not connected to a positive case.
- 3.8.2 Employers may also introduce Surveillance Testing as an additional control in circumstances with high community transmission. This testing will generally take the form of a rapid antigen test delivered onsite.
- 3.8.3 Workers participating in Workplace Cohort/Surveillance Testing will not be required to isolate while waiting for their test result or if their test result is negative.
- 3.8.4 Workplace Cohort/Surveillance Testing can take place, through:
  - a) a NSW Health testing team attending the DC;
  - b) the DC arranging an approved third-party testing organisation to attend the site or another location to provide testing; or
  - c) workers attending an established testing facility. Where asked by NSW Health to participate in Surveillance testing, distribution centres and warehouses will ensure that testing that is requested be in paid time or as otherwise agreed.
- 3.8.5 Participation by individual workers in Surveillance Testing is strongly recommended by both the employers and the unions committed to this Guidance. The testing is designed to keep the workforce safe and to ensure jobs and supply chains continue uninterrupted. However, participation is not mandatory for DC or warehouse workers unless ordered by NSW Health or implemented by the Employer as a risk control in consultation with the workforce.
- 3.8.6 NSW Health and Employers will endeavour to make non-invasive testing processes, such as saliva testing, available to workers involved in Workplace Cohort Testing as these methods become available.
- 3.8.7 Some testing options utilised for surveillance testing, such as Rapid Antigen Testing, have lower accuracy than traditional PCR tests. In circumstances where Rapid Antigen Testing is utilised, Employers must, based on NSW Health guidance and in consultation with the workforce, develop a clear protocol for the use of Rapid Antigen Testing, including:

- (1) the frequency and time at which the Rapid Antigen Test is to be completed, noting that Rapid Antigen Testing must be completed regularly for accuracy, but should not impose an undue burden on worker
- (2) the method of collection and supervision of collection
- (3) where workers should wait while awaiting results of their Rapid Antigen Test and how they should be cleared to enter the DC.
- (4) the steps to be taken in response to a non-negative Rapid Antigen Test, including pending a confirmatory PCR test.

3.8.8 Where a worker has a non-negative result using a Rapid Antigen Test, the employer should treat the worker as a positive case pending a confirmatory PCR test. If the confirmatory PCR test returns a negative result, no further action will be required, and any contacts excluded may return to work.

### **3.9 Psychological Health and Wellbeing**

3.9.1 COVID-19 presents a wide range of risks to workers' psychological health and safety, as well as their physical health and safety. These risks may be associated with changes in working conditions and concerns about contracting or spreading the virus. Increased anxiety among the general population also means that workers in certain sectors may be at risk of increased exposure to violence, harassment, abuse and aggression. Some team members may have family members who are at high risk if they contract coronavirus and they may be particularly anxious about that.

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

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

3.9.3 Employers must take a systematic, consultative approach to identifying, assessing and managing the work-related psychological health and safety risks related to COVID-19. Early intervention is crucial. Failure to effectively manage work-related psychological health and safety can lead to both psychological and physical injuries.

3.9.4 For further guidance, see:

- SafeWork Australia's Guide: Work-related psychological health and safety: A systematic approach to meeting your duties
- SafeWork NSW Mental health guidance available at <https://www.safework.nsw.gov.au/hazards-a-z/mental-health>
- NSW Government Mental health at work guidance available at <https://www.nsw.gov.au/mental-health-at-work>.

3.9.5 Employers are encouraged to provide their workers with mental health materials from national and state bodies. Where available, employers should also encourage the use of Employee Assistance Program (EAP) consultations. The offer of EAP support should be

made immediately where team members have been diagnosed as a confirmed case or as a close contact.

## 4.0 OTHER MATTERS

### 4.1 What if a worker does not have coronavirus but does not want to come to work?

- 4.1.1 Some workers may be particularly anxious in relation to coronavirus (COVID-19) for various reasons. For instance, a worker (or a member of their immediate family or household) may have a particular health condition that places them in a higher risk category in relation to COVID-19. As a result, such workers may not want to come into work, despite not having COVID-19.
- 4.1.2 In these circumstances, employers should consider whether they can accommodate a worker's request and either allow them to work from home or alternatively, to allow the worker to take annual leave, long service leave, banked RDOs or unpaid leave.
- 4.1.3 Employers should refer anxious and concerned workers to the Employee Welfare Line or Employee Assistance Program.

### 4.2 What to do if someone on site is unwell but says they don't have coronavirus?

- 4.2.1 If a worker is showing signs of an illness, they must not be at work.

### 4.3 What impact is coronavirus going to have on casual workers?

- 4.3.1 If any workers are engaged on a casual basis, those workers are unlikely to be entitled to personal leave, annual leave or long-service leave in normal circumstances. Coronavirus (COVID-19) is likely to have a major financial impact on casual workers if they are unable to work due to coronavirus (COVID-19) and do not have leave entitlements.
- 4.3.2 A worker may be entitled to seek assistance from the measures announced by the Commonwealth or NSW Government.

### 4.4 Government Assistance

- 4.4.1 Each employer will have their own site and/or company arrangements with respect to payments in various situations such as isolation while awaiting a test result or self-quarantine as a result of being a confirmed case or a close contact. Workers should check with their company HR or their union about what arrangements have been made in addition to their enterprise agreement. However, there are a number of Commonwealth and State Government supports that are also available.
- 4.4.2 The Commonwealth Government has announced financial support available to those affected COVID-19. Further details are provided at <https://www.servicesaustralia.gov.au/individuals/subjects/getting-help-during-coronavirus-covid-19/if-you-need-payment>
- 4.4.3 A one-off \$320 payment is available to support NSW workers if they are required to self-isolate while you wait for the results of their COVID-19 test. Applications can be made through <https://www.service.nsw.gov.au/transaction/apply-test-and-isolate-support-payment>
- 4.4.4 Workers may be entitled to workers' compensation if they contracted COVID-19 while at work. In some circumstances, an adverse reaction to a COVID-19 vaccination may be a compensable workplace injury. Further information is available from the State Insurance Regulatory Authority.

## 5.0 WHERE TO GO FOR CORONAVIRUS (COVID-19) UPDATES & FURTHER INFORMATION

- NSW Government COVID <https://www.nsw.gov.au/covid-19>
- NSW Health COVID <https://www.health.nsw.gov.au/Infectious/covid-19/Pages/default.aspx>
- SafeWork Australia: <https://www.safeworkaustralia.gov.au/>
- World Health Organisation: [www.who.int](http://www.who.int)
- Commonwealth Department of Health: <https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert>
- Fair Work Australia <http://www.fairwork.gov.au/about-us/news-and-media-releases/website-news/coronavirus-and-australian-workplace-laws>

## 6.0 ANNEXURE 1 – template escalation / de-escalation plan

with example triggers and controls for each step to be completed by each employer

Note that in all cases escalation / de-escalation plans must be subject to health directions or Regulations.

The masks and bubbles sections below are provided only as guidance/examples of appropriate controls in each context

	Escalation Controls	Active Controls	Step-down Controls	COVID Normal
Trigger	<ul style="list-style-type: none"> <li>Cases linked to the DC; <b>OR</b></li> <li>Widespread transmission in local area*</li> </ul>	<p><i>In the past 14 days in the local area there have been either:</i></p> <ul style="list-style-type: none"> <li>5 or more locally acquired unknown source cases; <b>OR</b></li> <li>15 or more total locally acquired cases.</li> </ul>	<p><i>In the past 14 days in the local metropolitan / regional area there have been both:</i></p> <ul style="list-style-type: none"> <li>4 or fewer locally acquired unknown source cases; <b>AND</b></li> <li>14 or fewer total locally acquired cases.</li> </ul>	<ul style="list-style-type: none"> <li>No locally acquired cases in the local metropolitan / regional area in the past 28 days <b>AND</b></li> <li>Christmas period has passed</li> </ul>
Screening workers coming to site	•	•	•	•
Workplace Mapping / Tracing	•	•	•	•
Physical Distancing	•	•	•	•
Bubbles	<ul style="list-style-type: none"> <li>Strict shift segregation mandatory.</li> <li>Sub-shift bubbles mandatory.</li> </ul>	<ul style="list-style-type: none"> <li>Strict shift segregation mandatory.</li> <li>Consider sub-shift bubbles and implement where practicable</li> </ul>	<ul style="list-style-type: none"> <li>Shift segregation to be maintained until alternate plan approved.</li> <li>Any team members on crossing shifts <u>must</u> be in separate bubbles that do not interact in common areas at the same time.</li> <li>Consider change to 2 shift model with 1 hard break if possible.</li> <li>Maintain segregation of transport team</li> </ul>	<ul style="list-style-type: none"> <li>Shift segregation to be maintained until alternate plan approved</li> <li>Shift segregation recommended where practicable</li> <li>Site flexibility, including use of bubbles</li> <li>Maintain segregation of admin and transport teams</li> </ul>
Hygiene	•	•	•	•
Ventilation	•	•	•	•
Shared Tools, Plant and Equipment	•	•	•	•
Cleaning and Disinfecting	•	•	•	•
COVID-19 Marshal	•	•	•	•

	Escalation Controls	Active Controls	Step-down Controls	COVID Normal
Trigger	<ul style="list-style-type: none"> <li>Cases linked to the DC; <b>OR</b></li> <li>Widespread transmission in local area*</li> </ul>	<p><i>In the past 14 days in the local area there have been either:</i></p> <ul style="list-style-type: none"> <li>5 or more locally acquired unknown source cases; <b>OR</b></li> <li>15 or more total locally acquired cases.</li> </ul>	<p><i>In the past 14 days in the local metropolitan / regional area there have been both:</i></p> <ul style="list-style-type: none"> <li>4 or fewer locally acquired unknown source cases; <b>AND</b></li> <li>14 or fewer total locally acquired cases.</li> </ul>	<ul style="list-style-type: none"> <li>No locally acquired cases in the local metropolitan / regional area in the past 28 days <b>AND</b></li> <li>Christmas period has passed</li> </ul>
Personal Protective Equipment	<ul style="list-style-type: none"> <li>Masks mandatory regardless of regulation</li> </ul>	<ul style="list-style-type: none"> <li>Masks mandatory regardless of regulation</li> </ul>	<ul style="list-style-type: none"> <li>Masks provided</li> <li>Masks strongly encouraged unless made mandatory by regulation</li> </ul>	<ul style="list-style-type: none"> <li>Masks provided and mask usage encouraged</li> </ul>
Inspections	•	•	•	•
Single site employment	•	•	•	•
Travel	•	•	•	•
General Communications	•	•	•	•
Vulnerable workers	•	•	•	•
Other measures	•	•	•	•

*“local area”*: means the LGA in which the DC/warehouse is located or in the immediate or adjacent local government areas to the LGA in which the DC/warehouse is located

7.0 ANNEXURE 2 – example cleaning signoff

# Certificate of Cleaning & Disinfection

*This facility has been cleaned disinfected using TGA listed/registered products in compliance with SafeWork Australia COVID-19 cleaning guidelines.*

**Responsible Person:**

**Cleaning carried out by:**

**Signature:**

**Date:**

**Time Start:**

**Time End:**

**Disinfectant Used:**

**Waste Removed:**

**Team Members Trained:**