Government
Health & Safety Lead

Supporting workers to work from home

A guide for Government agencies to manage risks for workers working from home

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New Zealand Government

Contents

Introduction to this guide

What is this guide about?

Workers are more frequently seeking flexible working arrangements with their employer, particularly working from home. Working from home can enable flexibility and freedom in how workers choose to work, and can help to manage work–life balance, accessibility challenges, and personal commitments. It can also enable business continuity in unplanned events which prevent workers from coming into the office. However, working from home is different to working in an office and may require additional measures to ensure it is healthy and safe for workers.

This guide is designed to support government agencies to take appropriate steps to ensure the health and safety, privacy and security of workers working from home. The advice within this guide is not prescriptive and should be tailored to each agency's needs and existing systems, while considering the types of work being undertaken by workers and circumstances around the working from home arrangement. For the purpose of this guide, the terms 'you' and 'agency' will refer to the person conducting business or undertaking (a PCBU) and employees of the agency will be referred to as 'workers'.

Many of the principles for managing health and safety risks also apply when managing security and privacy. Because health and safety, security, and privacy risks can interact and impact each other, they have been described in a shared context in this guide. Further information on security and privacy can be found in the resources section of this guide.

Who is responsible?

Under the Health and Safety at Work Act 2015, **agencies** (PCBUs) have a primary duty to ensure workers are not put at risk by the work they do, so far as is reasonably practicable. This includes the environment they work in. If your workers undertake some or all of their work from home, it is your responsibility to eliminate or minimise the risks arising from the unique hazards of the home-environment **so far as is reasonably practicable.** Reasonably practicable should should reflect the situation and context in which the agency and worker are in; in some cases, like an unplanned event, it may not be reasonably practicable to put in place controls that would be used for a planned, long-term arrangement

Agencies will have greater control over the health, safety, security and privacy of workers working from their premises than from home, however there are still practicable steps agencies can take to eliminate or minimise risks.

Workers also have a duty to take reasonable care to keep themselves and agency information safe while working. This is particularly important when working from home as agencies have less control over the home environment and aren't able to supervise workers as normal. Workers must also follow any reasonable instruction about their health and safety given by the agency.

You should **engage** with your workers when identifying the risks in their workplace and determining appropriate controls.

What is the risk?

Working from home can introduce unique risks that may differ from the office environment. These risks may also vary by the location work is undertaken, the nature of the work, and the circumstances under which the work is being undertaken. Additionally, there can be significant interaction between different types of risk when working from home, for example, a breach of information may compromise the security of a worker which may impact their physical safety. It is important to take a systematic approach to assessing and managing the risk to ensure workers are sufficiently supported to work from home.

How can I manage the risk?

When managing risks relating to health and safety, privacy, and security, use the *Plan-Do-Check-Act* approach to help ensure you take a structured step-by-step (systematic) approach to risk management. This guide will address each of these risk areas within each component of the *Plan-Do-Check-Act* framework.

Figure 1. WorkSafe New Zealand – Plan-Do-Check-Act approach
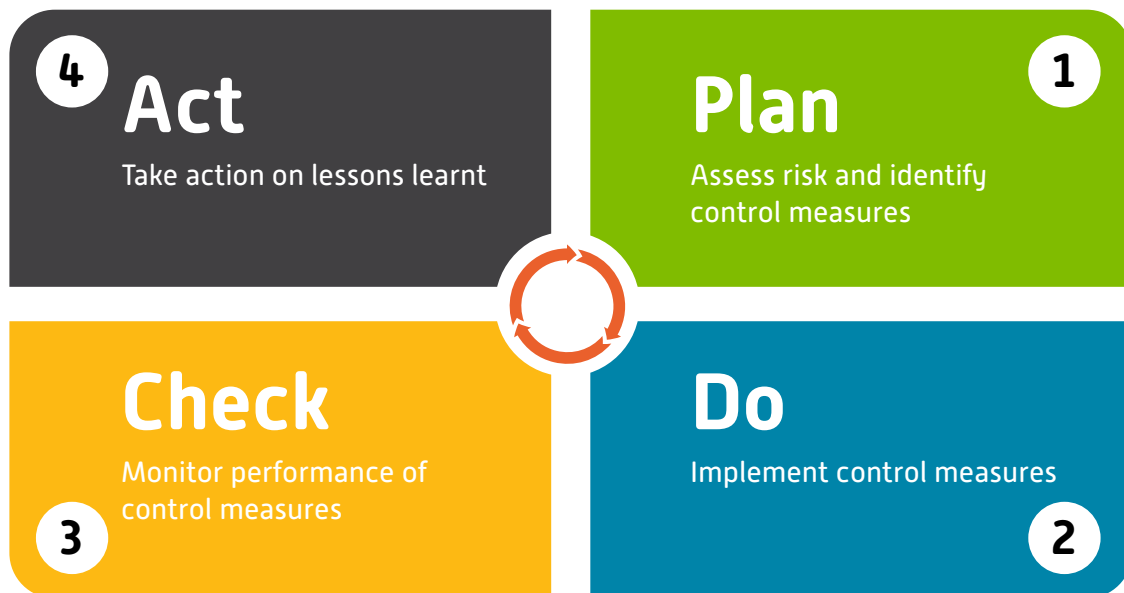
① Plan

Examples of common hazards of working from home

Health and Safety	Security	Privacy
• Uneven/slippery floors • Flammable materials • Electrical equipment • Workstation setup • Isolation/Lone working • Job design/workload • Hours of work • Other people in the home-work environment	• Inadequate home security • Information storage • Information transportation • Unauthorised software, malware and viruses • Device with information • Tracking functionality	• Worker's personal information or location • Agency information • Third party/client information • Mixed living arrangements • Insecure premises

In order to assess the risk, start by looking at the hazards (the things that could cause harm) that a worker may encounter while working at home. This may vary from worker to worker, and may differ due to the area or location of the work, the type of work, and specific circumstances under which the work is being undertaken.

Assess the risk

When assessing the risk, consider the **likelihood** that harm from the hazard may occur and the **consequences** (the degree of harm) if this happens. Consider how often your workers may work from home as this will help you to determine the level of risk exposure involved.

Some workers may be more at risk than others, such as mobility-impaired workers, workers with health conditions, or new workers. You'll also need to consider the unique circumstances for your workers when assessing the risk and identifying controls to manage this; if a worker has been asked to work from home for business continuity during an emergency for several weeks there may be additional risks than if they were working from home one day a week by choice to reduce their weekly commuting time.

It is important to also consider the potential interaction between different types of risks when working from home. For example, a breach of information could compromise the security of a worker which may impact their physical safety or psychosocial wellbeing.

Using a risk assessment tool can help you to assess the risk.

Examples of possible consequences from risks of working from home

Health and Safety	Security	Privacy
• Muscle strain • Repetitive strain injuries • Eye strain • Fatigue • Stress • Loneliness	• Compromised personal safety (physical attack) • Unauthorised access to information • Loss of information • Tracking of worker location by unauthorised person • Malware infection	• Unauthorised access/accidental sharing of information • Cyber security breaches • Loss of data privacy for self or client • Misuse of information

Identify controls

Once you have identified the hazards your workers may encounter while working from home, you will need to identify ways to control the risks that may arise from these. You must first try to eliminate the risk, but if this is not reasonably practicable you must put in place controls that minimise the risk. Controls should be proportional for the level of risk and what is reasonably practicable to put in place.

You are likely to have less control over your worker's home environment than the office environment. Therefore, it is especially important to clearly set the minimum standard of specific controls you expect to be in place in a worker's home.

Involve your workers in deciding the ways to eliminate or minimise risk, as they may offer a helpful perspective of the pros and cons of certain controls. Use the hierarchy of controls when deciding which controls to use:

	Type of control	Risk	Example control
Most effective	Eliminate	Breach of privacy with sensitive client information	Worker will not handle any client information while working from home
	Substitute	Unauthorised access to classified documents	Worker will only complete tasks that involve unclassified information
	Isolate	Visitor at the house may view documents on screen	Separate lockable office room from the rest of the house
	Engineer	Muscle strain from desk set up	Supply worker with ergonomically designed desk and chair
	Administrative	Psychosocial harm from isolation/lone working	Communication plan for manager to check in at scheduled times with home worker and scheduled team Skype meetings
Least effective	Personal protective equipment	UV radiation exposure while working outside on laptop	Wear protective clothing including sun hat and glasses

Examples of controls for working from home

Health and Safety	Security	Privacy
• Separate room (office) for work station • Ergonomic/work station assessment • Equipment/devices (surge-protected) • Communication plan • Manager monitor hours worked	• Home security system • Personal alarm • Lockable office • Lockable filing cabinet	• Encrypted information sharing systems • Secured internet connection • Work space set up • Use of agency-issued equipment and signatures/sign-off in communications

Document your plan

Once you've assessed the risks and identified your controls, document your approach to managing the risks associated with working from home. This may be a policy, protocol or standard outlining what you want to achieve, guiding principles, high level actions, roles and responsibilities and your procedures for monitoring and assuring the risk. Ensure that the roles and responsibilities within your agency relating to working from home are clearly defined, including those specific to managers and workers.

Example scenario

Tom and his team were given notice three weeks ago that they couldn't come into the office due to an outbreak of a contagious illness in the office. Tom's manager asked him to work from home as he is performing critical tasks for the business. This was fine for the first few days, but after three weeks of working from home, Tom is still not sure when he will be able to return to the office and is beginning to feel unsettled and stressed about his work. Tom performs critical tasks which often need to be checked by his manager, but this has not happened while working from home so Tom has started to work an extra two hours a day to thoroughly review his work. He's also not sure about the security of his home internet connection and is worried about sending some of his work via email. Tom's workplace did not yet have a working from home policy or procedures in place, so Tom's manager did not know to complete a working from home risk assessment. Because of this, Tom's manager failed to identify the risk of psychosocial harm. Tom's manager alerts the Health & Safety and Security teams to this and together they develop a policy and procedures to help her to assess the risk and identify suitable controls for this situation. Tom and his manager then assess the risk and identify controls:

Hazard	Risk	Likelihood	Controls
Lone working/ isolation	- Psychosocial harm (socially isolated from team, stress from reduced contact with manager)	Very likely	- Communication plan for regular daily contact - Secure mobile device to stay in contact
Work hours	- Fatigue - Psychosocial harm (overworked from extra hours worked)	Likely	- Reduced workload expectations - Agreement of hours of work
Cyber security	- Cyber security breach from unsecure internet connection	Low	- Stop tasks involving sharing sensitive information until back in office
Uncertainty around office re-opening	- Psychosocial harm (stress from uncertainty about returning to office)	Likely	- Regular communications/ updates from leaders - Peer Support programme - Date to review plan if office not re-opened

② Do

Implement controls to manage the risk

After you have identified control measures that are effective and reasonably practicable for your agency to implement, the next step is to put these in place. Your approach to implementation should be comprehensive, considering the key components that will help to embed this in your agency. Some of the key components are:

- **Communicate**
  Ensure your workers and managers are aware of your agency's working from home position. Managers and workers should be aware of the policies and procedures in place and understand their respective roles and responsibilities in relation to working from home. This is likely to include information about the potential risks, the controls (including minimum expectations for controls), why it's important to use them. Workers should be provided with information on how to apply them. All workers should also know where they can seek further guidance relating to health and safety, privacy, or security.

- **Initial check**
  Before a worker is given approval to work from home, complete an initial check to ensure a risk assessment has been completed and appropriate controls are in place. Managers need to be assured that the minimum expectations for controls are met. Your agency may consider putting in place a formal system and/or process to check this. This may include processes such as a self-report system where workers provide photographs of their home office set up, or complete a full health and safety, privacy and security assessment.

- **Supply**
  If workers don't have the necessary controls in place to manage the risks you have identified, you may need to provide workers with these controls (depending on the specific risk and/ or control). This may include supplying necessary equipment (e.g. desk chair, mobile phone, lockable file storage) or access to assessments (e.g. ergonomic assessments).

- **Systems to support controls**
  Put in place the systems you need to support the implementation of controls. Consider what systems you may need in place to check your controls are working, and what systems may be most helpful to support your workers to work from home. This may include online tools for workers to self-assess their home office, a support line for workers to call, and a reporting system to record any health and safety, privacy or security issues or concerns.

- **Train/Educate**
  Consider what guidance or training you may need to provide to managers or workers in understanding your agency's position on working from home, implementing the processes and procedures, and using any systems in place. This may include training for managers on completing a risk assessment, or guidance for workers on setting up their home work space or using a reporting system.

Example scenario

The Health and Safety team at a new government agency have just developed their *Working from Home* policy in response to the Human Resources team launching a flexible workplaces commitment. They consult with the Privacy and Security team before implementing this across the business and agree to work together in developing shared processes and procedures. The teams recognise they'll need to address multiple components to ensure the right systems are in place, and that both workers and managers know what to do. The Health and Safety team put guidance out for managers, including a checklist on the steps they need to take if a worker requests to work from home and a risk assessment tool. The team also upload a self-assessment tool on the work intranet for workers to self-assess their home work station. This includes instructions on reporting this to their managers using a self-submit tool to send photos of their home office setup. Both teams also share a reporting tool which has been adjusted so workers can use it to report any risks, near misses or incidents while working from home.

Figure 2. Example of guidance for workers

Incorrect Sitting Position   **Correct Sitting Position**   **Correct Standing Position**
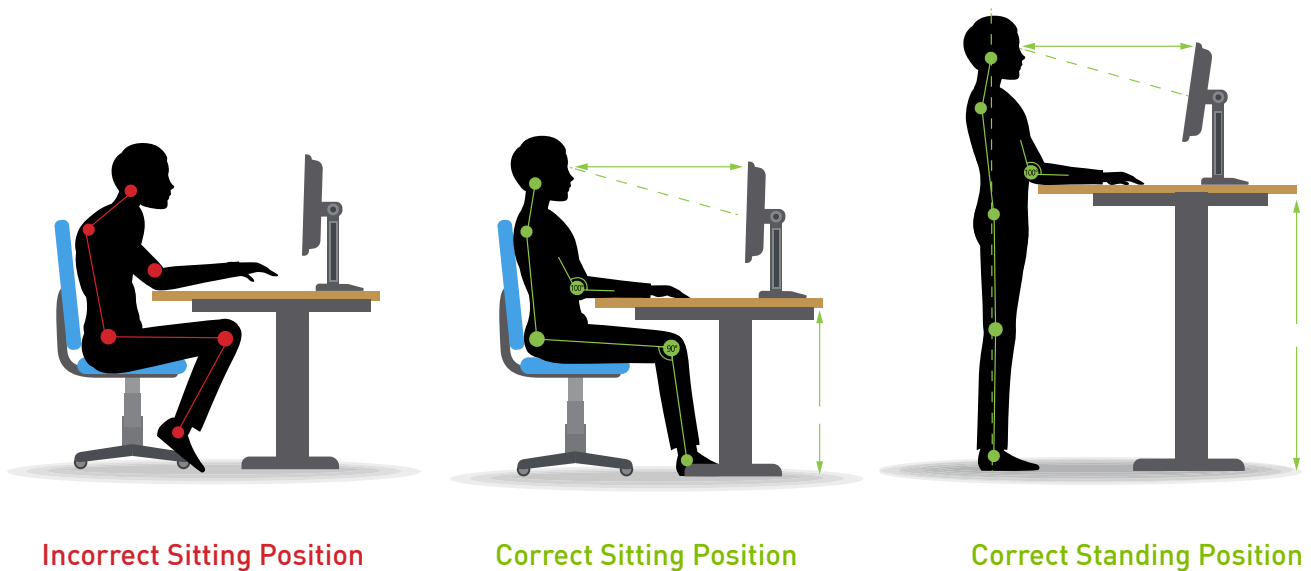
3 Check

Monitor the controls are working

Once your controls are in place, actively monitor how they are performing to make sure they are working the way they should. Your controls should remain effective and be suitable for the nature and duration of the work, and be implemented by workers correctly. The findings from these checks will help you to identify areas to improve on. Monitoring does not need to be complex or time consuming, this may be as simple as regularly checking in with workers and ensuring they report concerns or issues to you. Involve your workers when making decisions about how you will monitor the controls put in place. The key components for effective monitoring are:

Reporting: put in place a system or process for workers to report incidents, near misses, or concerns. Make sure this system or process is easy to use and is not off-putting to workers or encourages under-reporting. Some examples of reporting systems/processes include:

- Manager-worker 'check-in' on a scheduled regular basis.
- Regular pulse-checks to see if policies and processes are understood and are being followed.
- Scheduled ergonomic assessments.
- Privacy/security reviews.
- Health and Safety reporting system for incidents/near misses.

Communication: continuously encourage your workers to report concerns or incidents whether they are big or small. Any incidents that occur at home during work hours, and happen as a result of a work activity, should be considered a work-related incident and reported to the appropriate team to then review the controls in place.

Example scenario

Debbie manages a team of ten workers who all work between 2-5 days a week from home. Debbie reviews her agency's working from home policy and notes that it is the responsibility of the manager to check in with workers frequently and to report any health and safety concerns to the Health and Safety team if the worker hasn't logged them themselves. Her agency has a health and safety reporting system for near misses or incidents, but she's aware that her workers probably wouldn't use this to report minor day-to-day concerns. Debbie is concerned she might not have visibility of early indicators of health concerns, such as minor aches and pains from their desk set up, or feelings of isolation or stress from being a remote-working team.

Debbie decides to implement a system for her to monitor how her team are going and to capture any concerns early. She incorporates a simple 5-10-minute health and safety check into her scheduled weekly one-to-one phone call with each worker. Before she starts discussing general work matters in the catch-ups, she now begins with a health and safety check of how they are going and if they have any concerns relating to their work space, desk set up, workload, and remote working arrangement. Debbie keeps a secure record of her check-ins in a spreadsheet and keeps a separate password-protected document for concerns which she takes to the Health and Safety team for further advice.

④ Act

Regularly review the information gathered from your monitoring systems or processes. Look for common themes or any indications that the controls may not be working, then take action to address these. Consider collating this information into a report for governance or leadership teams to involve them in the process for improving or changing controls. Here are some of the ways you can take action:

- Update policies, processes and systems to ensure they are fit-for-purpose and align to the needs of your agency and your workers.
- Investigate incidents and near misses to identify their causes and what you need to change to prevent them from happening again.
- Ask workers on an ongoing basis to check if the control measures are effectively eliminating/ minimising work risks. Use the results of your ongoing worker conversations, reviews/audits, investigations and workplace/worker health monitoring to help you to continually improve the effectiveness of the control measures.

Example scenario

Tina manages a large Privacy and Security function within her agency. Her team collect data from a range of sources across the business which her Insights and Assurance team review. The team collate the data from several audits, monthly pulse-checks and the agency's formal reporting system. Tina notices there has been a spike in the number of threats made to case workers from clients, particularly about clients threatening to harm workers in their homes. After reviewing the monthly pulse-check data in particular, Tina notices that many of the workers who joined within the previous six months report they aren't aware of the agency's *privacy and security* policy. Tina sends an email out to the managers of the case workers for more information.

After several discussions with managers, Tina finds that because many of the new case workers weren't aware of the *privacy and security* policy, they have been stating in their email signatures the days they work from home. Tina takes these findings to the governance team, who decide that the agency needs to put more of a focus on communicating and training all workers on how to ensure their privacy and security while working from home. The Privacy and Security function work with the agency's Learning and Development team to develop a compulsory e-learning module for all workers which outlines the key points in the policy about managing their privacy and security while at work and at home. Several months later, Tina sees that the number of threats of harm to case workers at home begins to decrease.

Working from home checklist

Health and safety ∘ Privacy ∘ Security

	✓	✗
Plan		
We have a policy, protocol or standard in place that outlines our agency's position on working from home which describes roles and responsibilities	☐	☐
We have developed a risk assessment tool or guidance for managers on how to assess the risk	☐	☐
We have documented our procedure for monitoring and assuring the risk	☐	☐
We have provided guidance on our minimum expectations for controls	☐	☐
Do		
We put controls in place before we approve our workers to work from home	☐	☐
We have communicated to our workers and managers about our policies, procedures, guidance and tools so they are aware of them	☐	☐
We perform checks of our workers' set up at home to understand and confirm the controls in place/we have a process in place for workers to self-report on controls	☐	☐
We supply necessary controls (e.g. equipment, assessments) when we are not satisfied with the worker's controls and the level of risk requires it	☐	☐
We have put systems in place to support to support our controls (e.g. an online system for workers to report concerns)	☐	☐
We provide guidance and/or training for our workers and managers (e.g. how to complete a risk assessment, how to use the reporting system, how to use the controls we have identified)	☐	☐
Check		
We monitor the performance of our controls by collecting and reviewing relevant data (e.g. reviews, self-reports, formal reporting system data)	☐	☐
We continually encourage reporting of any incidents or concerns and create a culture where workers feel confident to raise issues	☐	☐
Act		
We regularly review and update our policies, processes and systems to ensure they are fit-for-purpose and align to the needs of our agency and workers	☐	☐
We continually review our monitoring information and discuss this with our governance/leadership teams	☐	☐
We investigate incidents and near misses to identify their causes and what we need to change to prevent them from happening again	☐	☐
We ask our workers on an ongoing basis to check controls are working effectively and provide feedback	☐	☐
We take action to continually improve our controls	☐	☐

Helpful resources

General

- **Protecting employees who work alone**
  (Ministry of Business, Innovation and Employment)

Health and Safety

- **Good Practice Guide on Remote Working**
  (Government Health and Safety Lead)
- **Habit at work**
  (ACC)

Privacy

- **Privacy Impact Assessment Handbook**
  (NZISM – Government Communications Security Bureau)

Security

- **New Zealand Information Security Manual**
  (NZISM – Government Communications Security Bureau)
- **Checklist for mobile computing and communications/remote working**
  (Protective Security Requirements)
- **Take a risk-based approach to information security**
  (Protective Security Requirements)
- **Working away from the office**
  (Protective Security Requirements)

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