



## Community & Public Sector Union

---

Brooke Muscat-Bentley,  
Deputy National President

19 June 2020

Parliamentary Standing Committee on Public Works  
PO Box 6021  
Parliament House  
Canberra ACT 2600

By email: [psc@aph.gov.au](mailto:psc@aph.gov.au)

Dear Parliamentary Standing Committee in Public Works,

**Department of Agriculture, Water and the Environment. Proposed fitout of new leased premises – Northbourne Ave, Canberra.**

As the primary union representing people working in the Department of Agriculture, Water and the Environment (DAWE), the Community and Public Sector Union (CPSU) is committed to providing a strong voice for our members. We welcome the opportunity to make this submission to Parliamentary Standing Committee on Public Works in response to DAWE's submission on the proposed fitout of the new leased premises in Canberra.

The CPSU has a number of concerns regarding the apparent failure to eliminate or minimise a number of Work Health and Safety (WHS) hazards in the design of the new building on Northbourne Avenue.

Despite the Department's submission only being completed last month, remarkably there is no consideration of COVID-19 and the ongoing potential impacts this pandemic will have on this workplace.

The proposal includes the use of hotdesking (now renamed in public service jargon as Activity Based Working (ABW)). There is currently an increasing amount of evidence both in Australia and internationally that Activity Based Working (ABW) is no longer a desirable or safe workplace practice. At no point is this issue canvassed in the Department's submission, rather there is an unfounded belief that ABW will be a safe and desirable practice for the next 15-20 years.

The current proposed design, with the embedding of ABW and incorporating hot desking as the main feature, fails to consider the following WHS hazards inherent in the ABW method. These include:

- Physical and psychosocial risks of COVID-19 and other communicable diseases
- Workplace Mental Health
- Accessibility for workers with disabilities or chronic health conditions
- Ergonomic hazards

Under section 19 of Work Health and Safety Act 2011, a person conducting a business or undertaking is under an obligation, as far as reasonably practicable, to eliminate or minimise

---

physical and physiological risks. Given the increasing evidence of the health issues resulting from hot desking in office environments, the decision to increase hot desking at the expense of personal workspaces seems flawed. It also suggests that no reasonable attempts to eliminate or mitigate these risks have been made.

As a result of COVID-19, many businesses in the private sector, who were once the champions of ABW and hot desking are moving away from this practice as a result of the WHS risks<sup>1</sup>. For the APS to centre this work design into a purpose-built office demonstrates an apparent lack of “future proofing” that could well result in a building that may be past its useful life once built.

The Chief Medical Officer, Professor Brendan Murphy, has publicly stated that hot desking will have to be done differently<sup>2</sup> and the CPSU has written advice from the Deputy Chief Medical Officer, Professor Michael Kidd, regarding the health risks of hot desking. An excerpt from this correspondence is outlined below:

*“Avoiding ‘hot desking’ if possible. This should be facilitated by moderating the number of people in the room. If this cannot be avoided, then spaces should be emptied of all personal items, and cleaned thoroughly between occupants.”*

### **Physical and psychosocial risks of COVID-19 and other communicable diseases**

CPSU members are concerned that the building is designed with hot desking as a major part of the design. The main concern about this is in terms of WHS, particularly considering the ongoing COVID-19 pandemic. The proposed allocated square metres per person is substantially less than current practice and will make physical distancing more difficult to achieve.

As a direct result of COVID-19 there is a renewed emphasis in phasing out hot desking in office environments as an outdated and unsafe work practice. The advice from Safe Work Australia is that hot desking is to be minimised where possible<sup>3</sup>. The very nature of a purpose built office means that it is possible to eliminate hot desking. This not a retrofit building where space is limited or there are operational reasons for hot desking (i.e. shift work in non-office based operational roles).

### **Cleaning of shared spaces**

In order to stop the spread of COVID-19, and other communicable diseases, there needs to be regular cleaning of shared spaces, including workstations utilised by multiple people. This represents a significant cost in terms of money and time and has not been factored into the design. For example, cleaning costs from similar ACT Government building where hot desking was slated to take place (Dickson Office Block – interim name) were found to be prohibitive.

---

<sup>1</sup> “Offices Are the New Cruise Ships for COVID-19.” *Australian Financial Review*, 6 May 2020, <https://www.afr.com/property/commercial/offices-are-the-new-cruise-ships-for-covid-19-20200506-p54q5j>.

<sup>2</sup> Chief Medical Officers Press Conference about COVID-19 on 5 May 2020. *Department of Health*, 5 May 2020, <https://www.health.gov.au/news/chief-medical-officers-press-conference-about-covid-19-on-5-may-2020>

<sup>3</sup> *Physical Distancing* | Safe Work Australia. <https://www.safeworkaustralia.gov.au/covid-19-information-workplaces/industry-information/office/physical-distancing>. Accessed 17 June 2020.

## Reduction in other communicable disease

The physical distancing and hygiene requirements have also led to a dramatic decrease in the amount of flu cases<sup>4</sup>. Designing a workspace that can limit COVID-19 infections will have the additional benefit of limiting the spread of other communicable diseases. This should result in a healthier and more productive workforce through less sick leave being taken.

There has also been a failure to consider what the ongoing psychosocial impacts of COVID-19 will have on the workforce.

The Department references a DAWR pilot study of ABW in 2018 on one floor of Marcus Clarke Street in support of hotdesking however the CPSU believes the results of that outdated pilot cannot be regarded as persuasive evidence that ABW will be safe for DAWE because:

- It was conducted pre-COVID-19, so it does not consider the changes to work that have been experienced as result of this pandemic. As we have not yet seen a full return to the usual workplace, it is premature to assume that workers will want a workspace environment that may have worked in 2018.
- The pilot is too small a trial to authoritatively state that it will be perceived in the same manner by workers not subject to the 2018 trial.

## Workplace Mental Health

ABW and hot desking arose out of a specific need in workplaces where workers were undertaking work that was not primarily desk bound. Whilst some workers thrive in this work environment, this is mainly workers with a high degree of autonomy over the work that they do and how they do it. For workers who are unable to exercise a high degree of autonomy or who undertake work that does not allow for movement around the workplace, ABW has caused a number of mental health issues<sup>5</sup>.

Forcing workers into a flexible work environment irrespective if it suits their work or their personal preferences creates potentially hazardous environmental conditions. This is an accepted workplace mental health hazard<sup>6</sup>.

The lack of any WHS risk assessment on ABW in DAWE is concerning and should have been conducted prior to the finalised proposed design of the building. If DAWE had set up a working group with affected staff, HSRs and the CPSU these issues would have been raised at the outset and a safer design could have been developed.

## Accessibility

One of the consequences of ABW and hot desking is that it is not conducive to creating an accessible workspace environment.

---

<sup>4</sup> "Physical distancing and good hand hygiene: Australian flu cases drop by more than 99%" *News GP*, 5 June 2020, <https://www.1.racgp.org.au/newsq/clinical/physical-distancing-and-good-hand-hygiene-australi>

<sup>5</sup> Sander, L bby. "The Research on Hot-Desking and Activity Based Work Isn't so Positive." *The Conversation*, <https://theconversation.com/the-research-on-hot-desking-and-activity-based-work-isnt-so-positive-75612>. Accessed 17 June 2020.

<sup>6</sup> *Mental Health | Safe Work Australia*. <https://www.safeworkaustralia.gov.au/topic/mental-health>. Accessed 17 June 2020.

By focusing the design on ABW and increasing hot desking, there is an underlying assumption that the workforce is able bodied with no underlying health conditions. By creating an office space that does not have space for all workers or that certain areas can only be used by able bodied workers, this building design represents a structural impediment to disabled workers being able to work for DAWE. See Department of Agriculture, Water and the Environment Proposed Fitout of New Leased Premises Canberra Submission 1:

*“64. Interconnecting stairs between floors will be provided to facilitate staff movement between floors and encourage a high level of interpersonal communication.”*

Employers are required to make reasonable adjustments to remove workplace barriers for workers with a disability<sup>7</sup>. Whilst unreasonable cost is a limit to this obligation, by having complete control of the design it is more than reasonable to expect that the workplace can easily be design to accommodate disabled workers in the provision of appropriate workspaces and the provision of an appropriate amount of disabled parking.

### **Ergonomic Risks**

As work becomes more computer based and more sedentary there is a greater understanding of the injuries that can be caused by office-based work. Even for staff who do not require adjustments as a result of disability, all workers will need to have a workspace that is ergonomically suited to them, as general work that could change daily is not ergonomically safe given the amount of screen based work required.

The CPSU does not believe that that safe design practices were followed in the creation of the building design<sup>8</sup>. One of the first considerations is the design and its intended purpose, and DAWE's submission is quite clear in that they have not considered where work groups will be located and that the hot desking will be a general workspace with no adjustments made for the different work requirements of work groups and individual roles. See Department of Agriculture, Water and the Environment Proposed Fitout of New Leased Premises Canberra Submission 1: 59:

*“It is too early to identify where specific business groups will be located in the new building. In order to cater to structural changes that are likely to occur within the Department, the fitout will be designed to provide a flexible and generic layout capable of accommodating most groups with minimal changes.”*

In addition to the lack of consideration given to safe workplace design, there are individual worker concerns as this building design does not consider how adjustments to this hot desking space can be accommodated as it's reasonable to expect that this will require a significant amount of office based equipment that will require greater storage space than is currently provided for, e.g. specialist chairs, desks, foot rests, keyboards and mice, voice activated software, computers, computer stands, desk phones and ergonomic supports.

In conclusion the CPSU believes that the DAWE proposed design and fitout of the Northbourne Ave building is seriously flawed and that it needs to be redesigned taking into account the issues raised in this submission.

---

<sup>7</sup> “Reasonable Adjustment Policy.” Australian Public Service Commission, 28 Mar. 2018 <https://www.apsc.gov.au/reasonable-adjustment-policy-0>

<sup>8</sup> Safe Design | Safe Work Australia. <https://www.safeworkaustralia.gov.au/safe-design>. Accessed 17 June 2020.

Thank you for considering this submission.

Yours Sincerely,



**Brooke Muscat-Bentley**  
Deputy National President