



NFF COVID-19 Workplace Guide

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Introduction

The agriculture industry faces a complex and dynamic challenge as Australia continues to wrestle with the impacts of the COVID-19 (coronavirus) pandemic. This guide contains basic advice on managing the impact on farming workplaces, including relevant work health and safety and industrial relations considerations. It is intended to facilitate thinking and decision making about jobs and the health and safety of people on farm, including family and workers, and ongoing job and business security and continuity.

However, it is by no means comprehensive, and while every effort has been made to ensure its accuracy, it is only intended to provide high level guidance and assistance of a very general nature. It is not legal advice, and it certainly does not constitute mandatory directions. Nor is it tailored to the needs of individual farms, and given the rate at which the COVID-19 crisis changes it may be quickly out of date. No responsibility will be taken if you rely on it to your detriment. Furthermore, care must be taken to follow the directives and recommendations of public health officials.

There is a wealth of guidance on the virus and the developing situation provided by the Federal government starting at:

- the Commonwealth Department of Health website [here](#)¹;
- Safe Work Australia [here](#)²;
- the Fair Work Ombudsman [here](#)³;
- the Commonwealth Department of Home Affairs [here](#)⁴.

In addition, specific requirements tend to vary from state to state. Links to the states' WHS regulators are [here](#)⁵. Although we have consolidated a lot of the existing advice in this Guide and apply it to farming contexts, the best practice — or if you need more information — would be to review the source materials.

It also bears saying that, in addition to those authorities, there is a wealth of information being developed by different organisations. While we have attempted to synthesise a lot of that work here, one of our biggest concerns at present is that messages may be confused or contradictory. If anything in this guide conflicts with something you have read or been told elsewhere, then please let us know. You can reach us [here](#)⁶.

Finally, this advice was last updated on **25 August 2021**, but as this crisis changes you are encouraged to confirm you are reviewing the most recent edition.

¹ <https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert>

² <https://www.safeworkaustralia.gov.au/covid-19-information-workplaces/industry-information/agriculture>

³ <https://coronavirus.fairwork.gov.au/>

⁴ <https://covid19.homeaffairs.gov.au/>

⁵ <https://www.safeworkaustralia.gov.au/whs-authorities-contact-information>

⁶ <https://nff.org.au/contact-us/>

General Overview of COVID-19

As a new disease, there is presently no immunity to COVID-19 in the community. As such, infection spreads very quickly. Those most at risk include people who have compromised immune systems or chronic illnesses, the elderly, and the very young.

Infection

According to the Department of Health, the virus is spread from 'person-to-person' contact through:

- Close contact with an infectious person (including before they start showing symptoms);
- Contact with droplets from an infected person's cough or sneeze; and
- Touching objects or surfaces that have cough or sneeze droplets from an infected person and then touching your mouth or face.

Symptoms

The symptoms of COVID-19 include fever, coughing, sore throat, fatigue, and shortness of breath. The severity of illness can range from feeling mildly unwell to serious respiratory disease. The government has generated an on-line tool for checking symptoms [here](#)⁷.

Length of time surfaces remain infectious

The current understanding is that COVID-19 can survive on any hard surface for a few hours to a few days. The length of time the virus survives on surfaces is highly variable, and the focus should be on hygiene and frequent cleaning. This will include both the skin of fruit and vegetables and packaging materials. However, it does not survive (for longer) on animal or vegetable matter.

The NSW Food Authority has published detailed advice on food safety and COVID-19 [here](#)⁸ and Queensland government advice is available [here](#)⁹.

General Practices

Although the information and advice which governments are giving about social practices are applicable at all times and as long as we are dealing with the virus, it is especially relevant at workplaces. Managers, supervisors and persons conducting a business or undertaking should ensure staff are aware and practising both.

The critical steps to minimising both the risk of getting infected and infecting others are:

1. Good hygiene; and
2. Social distancing.

The Federal government has generated a number of flyers and posters covering relevant information which can be found [here](#)¹⁰.

Naturally, if a staff member develops symptoms of COVID-19 then they should immediately self-isolate and seek medical advice from a doctor, emergency department, or from [healthdirect](#)¹¹.

⁷ <https://www.health.gov.au/resources/apps-and-tools/healthdirect-coronavirus-covid-19-symptom-checker>

⁸ <https://www.foodauthority.nsw.gov.au/help/covid-19-advice-for-businesses>

⁹ <https://www.health.qld.gov.au/public-health/industry-environment/disease-prevention-control/covid19-industry/food-retailers-and-covid-19>

¹⁰ <https://www.health.gov.au/resources/collections/coronavirus-covid-19-campaign-resources>

¹¹ <https://www.healthdirect.gov.au/>

General Practices

Good Hygiene

Although good hygiene is obviously always important, it is particularly critical while the COVID-19 virus remains a real and significant risk.

Good hygiene includes:

- Washing hands often with soap and water particularly before and after eating or using the toilet.
- Using an alcohol-based hand sanitizer.
- Covering the mouth when coughing or sneezing; generally, it's advised to cover with a tissue or elbow (obviously, hands are not a good option).
- Disposing of used tissues immediately and safely (in a bin).
- Avoiding touching the face (including eyes, ears, nose and mouth).
- Regularly cleaning and disinfecting frequently used objects (like phones and tools) and hard surfaces (like benches and doorknobs).
- Avoiding shared/ing food (e.g. communal bowls of chips).
- Avoiding 'hotspots' (such as locations and institutions known to have an occurrence of contagion) and large gatherings;
- Monitoring the health and safety of yourself and others for signs and symptoms of COVID-19 (described above);
- If you see or suspect symptoms in someone else (whether in the workplace or otherwise), keep a safe distance and notify a manager or supervisor; and
- If you suspect symptoms in yourself or anyone you have had contact with then immediately isolate yourself, notify a manager or supervisor, and seek medical advice.

For further information about social distancing, both at home and in the workplace, and gatherings, see [here](#)¹².

Social/Physical Distancing

The basic rule is that you should always maintain 1.5 metres (approximately two arms-lengths) distance from anyone else and, in enclosed areas, ensure that there is 4 metres of clear space available for each person. This applies at all times, including at work and while traveling.

Furthermore, quarantine yourself if you have reason to suspect that you have been exposed to the virus and eliminate or minimise activities which may increase your risk of contracting or spreading COVID-19.

- Minimising — which also means, to the extent possible, eliminating — direct and indirect contact with anyone else such as shaking hands or sharing tools;

Social Distancing in Vehicles

Social distancing in vehicles — for example, when workers are being bused to/from the worksite — is basically the same as at any other time. The position would not vary significantly from that which applies at the workplace generally. Ideally, no more than 2 people in the vehicle. Otherwise, maintain 1.5 metres between passengers and 4 meters per person (this will typically mean just one passenger per standard sized car), use any other reasonable measures such as personal protective equipment (**PPE**)¹³ to minimise the risk of exposure, and if in doubt contact the WHS regulators or Department of Health for guidance. And, of course, if there is a real chance one of the passengers may be infectious, they should not be allowed in the vehicle and should be quarantined immediately.

¹² <https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert/how-to-protect-yourself-and-others-from-coronavirus-covid-19/physical-distancing-for-coronavirus-covid-19>

¹³ https://register.labourhireauthority.vic.gov.au/LhSearch/PerformSearch?TotalCount=0&Page=1&PageSize=20&SearchResultsVM=System.Collections.Generic.List%60%5BCav.Gem.PublicRegisterSearch.DomainEntities.LhSearchResult%5D&SearchBy=Name&SoundsLike=False#_ga=2.25242293.92400721.1585454446-571499659.1585454446

Access to Labour and Workforce Planning

Generally

One of the biggest impacts on farming businesses of the COVID-19 pandemic will be access to labour.

Obviously, like all workplaces, farms will have to manage occasions on which staff cannot attend work because of quarantine requirements or because they develop COVID-19. We will cover some of the industrial relations implications below.

On a practical level, however, farms should develop contingency arrangements for the possibility — or likelihood — that staff may be unable to work as a result of the pandemic. For isolated rural farms this could be a significant issue but establishing contact with job placement agencies and (legitimate) labour hire providers that can source workers with the right skills would be a good first step.

Lists of labour hire providers which are licensed under state schemes are [here](#)¹⁴ (VIC), [here](#)¹⁵ (QLD), and [here](#)¹⁶ (SA), and you can search the registry of StaffSure certified providers [here](#)¹⁷. There are a number of job placement agencies who can link you with prospective employees, NFF's FarmHub links to a number of resources [here](#)¹⁸. Services such as Farm Ready Hub ([here](#)¹⁹) are also good resources, and state farming and commodity bodies may also be able to assist.

Travel and Border Arrangements

We fully expect that the governments²⁰ will maintain the view that food and fibre production are 'essential services' and so need to be maintained during any crisis. However, farming may be more significantly affected by the closure of state and international borders and restrictions on people movement than other industries.

1. In September 2020, five of the eight state and territories agreed to a National Agriculture Worker Code to govern state/territory border movement. However, the Code has not been consistently implemented and states tend to adopt their own travel restrictions and criteria, often with little advance notice. The Federal government maintains links to the various state and territory websites which document their respective approaches [here](#)²¹.
2. At the time of writing and for the foreseeable future, international borders are generally (subject to the initiatives described below) closed to all travellers, including international migrants who would otherwise have the right to work on farms such as backpackers and skilled visa holders.
3. The government may make an exception for skilled agricultural workers where there is a 'critical skills need'; see [here](#)²². However, those exceptions are granted on a case-by-case basis. As such, the farm/employer will have to make a very strong argument for an exemption, which will basically mean demonstrating that the worker is vital to the business, that the farm has made every reasonable attempt to engage a person who is already in the country, and the migrant worker is an option of last resort.

¹⁴ https://register.labourhireauthority.vic.gov.au/LhSearch/PerformSearch?TotalCount=0&Page=1&PageSize=20&SearchResultsVM=System.Collections.Generic.List%601%5BCav.Gem.PublicRegisterSearch.DomainEntities.LhSearchResult%5D&SearchBy=Name&SoundsLike=False#_ga=2.25242293.92400721.1585454446-571499659.1585454446

¹⁵ <https://ols.oir.qld.gov.au/licence-register/search/>

¹⁶ <https://secure.cbs.sa.gov.au/OccLicPubReg/index.php>

¹⁷ <https://www.staffsure.org/StaffSure/Registry.aspx>

¹⁸ <https://farmhub.org.au/australian-farm-jobs/>

¹⁹ <https://farmreadyhub.com>

²⁰ Although there is a general misunderstanding that this is a decision of the Federal Government, it is actually a decision of state governments so rules and criteria may vary from jurisdiction to jurisdiction.

²¹ <https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert/coronavirus-covid-19-restrictions/coronavirus-covid-19-domestic-travel-restrictions-and-remote-area-access>

²² <https://covid19.homeaffairs.gov.au/critical-skills-and-sectors>

Access to Labour and Workforce Planning

4. On 3 April 2020 the Federal government announced that some migrant workers who are unable to return to their home country and are employed in agriculture can apply for a 'COVID-19 Pandemic Event Visa' and will not incur a visa application charge. This visa will allow workers who are currently in Australia and hold or held a valid visa within the last 28 days (including a bridging visa) to remain in Australia and continue working until it is safe and practicable to return home. More information can be found [here](#)²³.
5. The Federal government has softened restrictions on workers arriving under the Seasonal Worker Program and the Pacific Labour Scheme (aka the Pacific Worker programs or PWPs) to allow worker to arrive under those programs in states and territories that 'opt in'. However, the arrivals must be in accordance with the stipulations on quarantine requirements and caps on numbers which the states set. At the time of writing, roughly 10,000 PWP workers had arrived in Australia to work on farms. However, access to and/or engagement of PWP workers under the 'restart' arrangements is tightly regimented and requires significant forward planning. More information can be found [here](#)²⁴.

Protocols – Managing Risks Posed by Itinerant Workers

We will address workplace health and safety more broadly below. However, it is imperative that every farm which engages itinerant workers, such as backpackers, during harvest, have very solid protocols in place to manage risk and that those protocols are strictly observed.

The following **12 Steps** are of general application when engaging itinerant workers. Without more we would strongly urge you to follow them.

1. Always know where both new and current workers have been for the previous 14 days, including where they are living and, at least generally, who they have been associating with.
The declaration/checklist (see point 4, see page 6) will address this requirement.
Although it may seem invasive, in the current crisis, workers should expect their employers to ask these questions, and provided you maintain their privacy it should not present an issue.
2. Ensure that any new worker with no prior exposure to your workforce observes a 14-day isolation period prior to commencing work.
New workers can be isolated on the farm if they observe social distancing requirements within the farm gate and do not share accommodation with other workers.
The authorities are aware of the issue of paying for expenses such as food and accommodation whilst the worker is isolated but at present the hard truth is that the worker must find a way to cover it themselves.
The Red Cross has been funded to provide emergency relief and casework support for temporary visa holders who have no way to support themselves and have urgent needs. More information about support payments can be found [here](#)²⁵.

²³ <https://immi.homeaffairs.gov.au/visas/getting-a-visa/visa-listing/temporary-activity-408/australian-government-endorsed-events-covid-19>

²⁴ <https://www.dese.gov.au/seasonal-worker-programme>

²⁵ <https://www.redcross.org.au/news-and-media/news/help-for-migrants-in-transition>

Access to Labour and Workforce Planning

3. Ask new/potential workers to share accommodation with the others in their work team — especially if you can provide it for them — as long as they do not mix with existing workers.
If you've already got workers on the farm they should not share accommodation with new workers
You are entitled to give priority to job applicants who can demonstrate a willingness to observe that request.
4. Register your business for the QR code app which has been developed by your state/territory government²⁶ and ensure each worker uses it to 'check-in' each day/shift. Where the employee does not/cannot use the check-in app, obtain a declaration from them covering movements and potential exposure (such as the checklist at the end of this guide) and retain it as a workplace record.
Although this may be tedious, it will not only allow you to plan and prepare, it may also influence the employees' behaviour while away from work.
5. Hold a toolbox talk before each shift explaining social distancing and hygiene requirements, and the other protocols you have put in place.
6. In general — and subject to the WHS legal requirements considered below — take a risk-based approach to the way work is performed by your employees and particularly where they do their work and their proximity to other employees.
For example, to the extent it is practicable, ensure that worker who pose a potential risk (e.g. have not been working for you for 14 days) work separately from those who you can be more confident do not carry the virus.
7. Adopt and/or change work practices and procedures to reflect current circumstances and advice, and enable workers to observe hygiene and social distancing requirements while working.
Appropriate protocols will vary from farm to farm, but consider limiting staff to essential duties, staggering shifts, and ensure cleaning and disinfectant facilities are available and used before, during, and after each shift.
8. Ensure you know where your staff are at all times while at work.
Ideally you should keep good records of where and what they are doing
9. If any workers demonstrate any symptoms follow the steps on page 11:
 - a. Immediately isolate the suspected infectious person and direct them to be tested for the virus;
 - b. Identify and immediately isolate anyone who the infectious person may have contacted and direct them to be tested for the virus;
 - c. Thoroughly clean and disinfect any places or things that they (or their immediate contacts) were in contact with;
 - d. Contact your state health department or WHS regulator for further advice. Provided that you have followed guidance from reliable sources there shouldn't be any cause for concern that they will penalise you.
10. Advise workers that they will be subject to appropriate disciplinary action where they violate the protocols you put in place.
For example, if they provide misleading information on declarations or disobey social distancing requirements.
11. Report any workers who are violating social distancing and isolation requirements to the WHS regulator, police, local councils, or other appropriate authorities and consider appropriate disciplinary action.

²⁶ <https://www.covid19.qld.gov.au/check-in-qld>, <https://www.coronavirus.vic.gov.au/register-to-use-vic-gov-qr-code-service>, <https://www.coronavirus.tas.gov.au/check-in-tas>, <https://www.covid19.act.gov.au/stay-safe-and-healthy/check-in-cbr-app>, <https://www.nsw.gov.au/covid-19/rules/check-in/service-nsw-app>, <https://safewa.health.wa.gov.au>, <https://www.covid-19.sa.gov.au/restrictions-and-responsibilities/covid-safe-check-in>

Access to Labour and Workforce Planning

12. Finally, encourage and enable vaccination of workers; see page 16.

Please bear in mind, however, you may need to tailor these steps to your worksite and industry, and they must be subject to any changes in rules or directions given by the state and Federal governments. Links to each of the authorities is at the end of this document.

Also bear in mind that engaging labour hire workers or contractors may pose additional risk. Although it's always strongly recommended that farms only engage with providers who they can be confident run fair, decent and legal operations (see page 4), the use of disreputable labour hire operators who may provide squalid and over-crowded living/working conditions is all the more risky and objectionable at this time.

Accommodation

If you provide accommodation to your staff during the pandemic there will be a few basic tenets which you should observe:

- The principles relating to social practices, especially hygiene and social distancing, continue to apply.
- Obviously, the premises should be thoroughly cleaned and disinfected before the worker arrives, after they leave, and regularly during their stay.
- To quarantine the risk of infection, staff who work in teams should be housed and travel within the same teams.
- Ensure social distancing principles are adhered to, including one person per four square metres.

- You may be obliged to comply with any governmental requirements which are issued to commercial accommodation providers²⁷.
- In most jurisdictions WHS obligations extend to accommodation which is provided by employers²⁸ so the principles discussed below would also apply.

Of course, encouraging staff to live with the teams they work in is best practice and you should consider facilitating it to the extent that you can, when, for example, considering working hours and shifts.

Financial Support Packages

The government has announced a number of changes to taxation and social security arrangements that will help businesses continue to employ their staff and provide assistance to those who are displaced from work.

- The stimulus packages which provide assistance to business are describe [here](#)²⁹.
- The packages which are available to help displaced workers are described [here](#)³⁰.
- Information tailored to the needs of farm businesses can be found on Farmhub [here](#)³¹.

²⁷ We are not aware of any specifically relating to the provision of accommodation but will update this guide if/when we do.

²⁸ 19(4) of the harmonized Work Health and Safety legislation

²⁹ <https://business.gov.au/Risk-management/Emergency-management/Coronavirus-information-and-support-for-business>

³⁰ <https://www.servicesaustralia.gov.au/individuals/subjects/getting-help-during-coronavirus-covid-19/if-you-need-payment>

³¹ <https://farmhub.org.au/covid-19/>

Workplace Health and Safety Obligations

Staff Management and General Principles

At a **very** high-level, work health and safety laws are consistent across Australia. We will attempt to advise generally in accordance with those laws for the purposes of agricultural workplaces. The specifics of those laws, however, vary from jurisdiction to jurisdiction and you are strongly advised to check in with your local WHS regulator [here](#)³².

The basic tenet is that a person conducting a business or undertaking must take all reasonably practicable steps to minimise or eliminate any risk to health or safety present at the workplace. As indicated above, each of the WHS regulators provide advice tailored to their jurisdictions. Furthermore, a detailed guide on what this means in the context of the COVID-19 pandemic has been produced by the law firm Corrs Chambers Westgarth and is available [here](#)³³.

However, there are several steps which you can take at a practical level.

- *Requiring and enabling your staff to observe the good hygiene principles identified above.*
This means providing and directing workers to use hand washing facilities and making sure the worksite is kept clean and properly stocked with cleaning products. It also means disinfecting potentially contagious surfaces, such as those which have been exposed to 'respiratory droplets' after someone has coughed, and obviously thoroughly cleaning any site where an infectious worker has been. The Federal Government has generated detailed guidelines [here](#)³⁴.
- *Requiring and enabling your staff to observe the social distancing principles identified on page 3.*
This will include, to the extent that it is reasonably practicable, enabling workers to work at a distance of 1.5 metres from each other.

Other options to consider include:

- Breaking staff into smaller teams;
- Adjusting rosters to minimise the numbers of staff at the site, and staggering shift and break times to reduce overlap between teams;
- Adjusting the layout of the workspace and any common areas e.g. divide the workspace into zones and remove chairs from lunchrooms;
- Streamlining processes to reduce cross-contact; e.g. ensuring materials used on the packline are handled within the team;
- Making sure the workplace is very well ventilated.

Of course, social distancing may not always be 'reasonably practicable' in, for example, a small packing shed so other arrangements may have to be considered. For example, providing and requiring workers who are in proximity to each other to use physical barriers (e.g. perspex screens) and PPE such as gloves and masks.

Ensure any PPE is used properly; e.g. masks fully cover the face and nose and are disposed of appropriately at the end of the shift³⁵.

- *Require staff who may have been exposed to the virus to remain away from the workplace.*
Obviously, this is critical and will have industrial relations implications which are considered below.
- *Posting the materials and resources on coronavirus protection and safety, and directing workers to watch safety videos from reliable sources.*
The Federal government's resources can be found [here](#)³⁶. Most of the state health departments have also made professionally produced resources freely available.
- *While respecting personal privacy, requiring staff to regularly complete a disclosure form.*
This will indicate where they have been for the previous 14 days, that they are not aware of any contact with any infectious persons, and that they have no symptoms or signs of infection themselves.

³² <https://www.safeworkaustralia.gov.au/whs-authorities-contact-information>

³³ <https://corrs.com.au/site-uploads/images/PDFs/Insights/article-employment-covid-19-work-health-and-safety-issues-for-employers-as-australia-returns-to-work.pdf>

³⁴ <https://www.health.gov.au/sites/default/files/documents/2020/03/environmental-cleaning-and-disinfection-principles-for-covid-19.pdf>

³⁵ See page 10 under heading Personal Protective Equipment

³⁶ <https://www.health.gov.au/resources/collections/coronavirus-covid-19-campaign-resources>

Workplace Health and Safety Obligations

Ideally the declaration would be made before the commencement of each shift.

You should also make it clear that being untruthful or misleading in the disclosure may be cause for disciplinary action. Although the information the employee provides may or may not be reliable, it is important that you are able to demonstrate that you made the enquiries, and having them sign a document attesting to their claims may cause them to think twice about misleading statements.

Similar declarations should be obtained from contractors and labour hire providers.

A sample disclosure form is annexed to this document (see page 19).

- *Registering with your state's or territory's check-in and QR code apps and requiring your staff to use them.*
- *Discouraging staff from coming into contact (e.g. touching) anything unnecessarily.*
Staff should be directed not to, for example, share tools or move around the workplace unnecessarily.
- *Limiting site access to essential staff and support workers.*
This may mean implementing extraordinary measures to deal with deliveries and logistics. If possible, support services, such as consultants/agronomists should be directed to wear PPE and not have direct contact with any staff or interact via electronic methods.
- *Use contactless payment systems where possible.*
Given that cash (by design) will pass through many hands, using contactless payment systems is encouraged. The Modern Awards allow payment to employees to be made by electronic funds transfer³⁷, and retailers are entitled to refuse to accept cash and require, e.g., the use of 'payWave'.

- *If someone who was potentially exposed to the virus has attended the worksite, then everywhere that person has been in contact with should be cleaned and disinfected.*

Queensland Department of Health provides complete directions [here](#)³⁸.

- *Anyone in close contact with a suspected or known case should be tested and directed to isolate in accordance with public health guidelines or, if that is not possible, to isolate for 14 days and until it can be confirmed that they have not contracted the virus.*

The closest testing clinics can be found at the website [here](#)³⁹.

- *Maintaining good records of staff and staff movement.*

This should make it possible to contact trace and track where an employee was and who they may have been in contact with at any given time. This will obviously be crucial to containing any outbreak if an employee is diagnosed with the virus.

- *Communication is key, especially as there is a WHS obligation to consult with workers on matters relating to COVID-19.*

Keep workers informed of the steps in minimising infection, of any developments at the workplace, and of the decisions and declarations which are made by government and could affect them. Seek and listen to their views. And make sure that they know they can raise any concerns or issues with you.

- *Make sure any staff handbooks and WHS policies & procedures are up to date and available to staff.*

Make sure that handbooks address this crisis – e.g. to include cleaning and sanitising procedures – and that your staff is familiar with handbooks in their most current form.

³⁷ Clause 20.2 of the Horticulture Award, clause 16.2 of the Pastoral Award, and clause 27.2 of the Sugar Industry Award.

³⁸ <https://www.health.qld.gov.au/public-health/industry-environment/disease-prevention-control/covid19-industry/covid-19-cleaning-disinfection-waste-management>

³⁹ <https://widget.nhsd.healthdirect.org.au/v1/widget/search?widgetId=2bd9a3ab-54e6-4ddf-a9df-44fef0c2e81b&types=%5Bservices&types%5D%3Aall+services&filters=%5Bprograms%5D%3Acovid+19>

Workplace Health and Safety Obligations

- *Be supportive of your staff.*

Be conscious of the effects isolation may have on mental health, and the anxiety and stress which the present situation may foster. Resources can be found [here](#)⁴⁰.

- *Finally, do all that you can to encourage vaccination without offending any applicable laws.*

We consider COVID-19 vaccination rules, requirements, protocols, and best practice in greater detail below at the end of this guide.

Safe Work Australia has generated a range of workforce checklists which identify most of the things you should be aware of when managing a workplace. They are available [here](#)⁴¹, and there are tips on dealing with mental health issues associated with COVID-19 [here](#)⁴² and [here](#)⁴³.

Personal Protective Equipment (PPE)

Various forms of PPE, including gloves, medical masks, goggles, face shields, etc are available to inhibit the spread of the virus.

When the pandemic first emerged, advice on the use of face masks was somewhat inconsistent across various authorities. This was partly because demand for the products outstripped supply so that they were reserved for cases of serious risk, but also because misuse may actually increase risk.

At the time of writing, the wearing of masks is generally encouraged and in some cases mandated. You should check with your states/territory's health authorities on the rules relating to mask use. The Federal government's advice is [here](#)⁴⁴.

Where mask are being used, it is recommended that workers be provided with good instruction or training on the use of PPE. The Department of Health's guidance videos are [here](#)⁴⁵ and the Victorian government has provided detailed guidance [here](#)⁴⁶. Things to be mindful of include sanitising hands immediately before and after taking a face mask or gloves on and off and disposing of them correctly.

⁴⁰ <https://www.safeworkaustralia.gov.au/covid-19-information-workplaces/industry-information/home-services/mental-health>

⁴¹ <https://www.safeworkaustralia.gov.au/collection/workplace-checklists-covid-19>

⁴² <https://www.lifeline.org.au/get-help/information-and-support/covid-19/>

⁴³ <https://www.health.gov.au/resources/publications/covid-19-national-health-plan-supporting-the-mental-health-of-australians-through-the-coronavirus-pandemic>

⁴⁴ <https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert/how-to-protect-yourself-and-others-from-coronavirus-covid-19/masks>

⁴⁵ <https://www.health.gov.au/news/health-alerts/novel-coronavirus-2019-ncov-health-alert/coronavirus-covid-19-advice-for-the-health-and-disability-sector/personal-protective-equipment-ppe-for-the-health-workforce-during-covid-19>

⁴⁶ <https://www.coronavirus.vic.gov.au/face-masks>

Workplace Health and Safety Obligations

What to do in case of a suspected exposure

Perhaps the most concerning prospect for any business, including farms, in the present environment is the prospect of an infectious person attending the workplace and directly or indirectly infecting the entire workforce, potentially causing the business to shut down.

Following the steps outlined above will limit the prospect of this happening and the impact if it does. Good preparation will not only help your farm remain virus free, but it may be the difference between mild inconvenience and a total collapse of the business.

It goes without saying that this is a very real risk for which all businesses have to prepare.

Aside from doing everything you can to avoid exposure, the best thing you can do in advance is prepare contingency arrangements. It would be advisable to prepare for changes in staff roles and responsibilities. Consider ways in which roles could be merged or non-essential duties could be left aside over the short/medium term. Prepare emergency training to make sure staff has the necessary skills if there are role changes, and consider which staff may be suitable for a changed role e.g. identify who may be appropriate and motivated to move into a supervisory position.

Also, identify good and reputable sources of casual workers including labour hire providers (see page 4) to make up for any staff you may lose, and confirm that they can provide workers on short notice with the skills you need when you need them.

You should also prepare your suppliers, clients, and customers, and keep them updated on your preparedness and contingency plans.

That aside, as noted on page 6, in the event of a (potential) outbreak the best response will be to:

1. Immediately isolate any suspected infectious person and direct them to be tested for the virus;
2. Identify anywhere and anyone else that the infectious person may have been in contact with;
3. Immediately isolate anyone who the infectious person contacted and direct them to be tested for the virus;
4. Thoroughly clean and disinfect any places or things which they (or their immediate contacts) were in contact with;
5. Contact your local WHS regulator for further guidance. Provided that you have followed the advice of reliable sources then there shouldn't be cause for concern that the regulator will penalise you.

Aside from these recommendations, your response will have to be risk based and site/situation specific. You may or may not need to shut down, depending on the particular circumstances. Unfortunately, there is no easy solution, and the best defence will be to minimise the risk of an outbreak and plan effectively so that you are able to respond — and actually do respond — very quickly.

Industrial Relations

Generally

The rights and obligations of employers and employees under the Fair Work Act have been seriously tested during this pandemic. The Fair Work Ombudsman (**the FWO**) has published thorough and current guidance [here](#)⁴⁷.

We will touch on some of the key issues, but please bear in mind that this is general advice and given we are discussing legal rights and duties, the position will vary from case to case. It will be affected by things like the situation at work, the position and circumstances of the employee, any applicable employment contracts and enterprise agreements, etc. You would be strongly advised to seek specific advice from an industrial relations specialist before taking any action which may affect your employees' pay or work rights. Your state and commodity farming organisation may offer such services, the FWO has established a dedicated hotline which can be reached at 13 13 94⁴⁸, and the Fair Work Commission's advice service is still operating ([see here](#)⁴⁹).

Giving Directions

The extent of an employer's right to issue directions to an employee on matters which aren't strictly and directly related to the performance of duties is never clear, but will be informed not just by industrial relations instruments but, in the current context, also work health and safety duties, anti-discrimination laws, etc.

If an employee presents for work demonstrating symptoms of COVID-19 and the employer has a reasonable and genuinely held belief that the employee may have contracted the virus then:

1. The employer may ask or, if the employee refuses, direct the employee to consult a GP and/or undergo testing (paying for the time involved).

2. If the employee tests positive, then the employer may direct the employee to take sick leave (with or without pay).
3. If they test negative, then there is still a small risk (e.g. of a false negative)⁵⁰ and the employer will have to use their judgement. They may decide to allow the employee to continue work while, as a minimal step, socially isolated and/or wearing full PPE for 14 days⁵¹.

If the employee refuses to be tested or testing is unavailable and the employee is displaying symptoms, then the employer will have to use the best alternatives available to determine the likelihood that the person is sick. If they believe that the employee is unfit for duties, they can direct the employee to take personal leave. If the employee poses a health risk to themselves or other staff then the employee should be prevented from attending the worksite on WHS grounds until they no longer present a risk. We cover leave and other arrangements below. Unfortunately, however, there are no clear rules around sending an employee home when they are otherwise 'fit for duties'. As such, taking this controversial step should be approached with caution, and again we would suggest you seek specific advice.

If sending the employee home is not possible or, on balance, less draconian measures are called for, the duty to take reasonable steps abides. Those steps may include, for example, instituting very strict social distancing protocols, requiring the employee to wear PPE (masks and gloves), etc. Again, the right steps will be determined by the specific circumstances and the employer will need to use their best judgment.

The situation is even more difficult where the employee is not showing symptoms but may have been exposed to the virus; e.g. because a member of the household engaged in risky behaviour such as congregating at a crowded hotspot. If possible, the

⁴⁷ <https://coronavirus.fairwork.gov.au/>

⁴⁸ <https://www.fwc.gov.au/resources/where-get-legal-help/workplace-advice-service>

⁴⁹ <https://coronavirus.fairwork.gov.au/>

⁵⁰ <https://www.washingtonpost.com/science/2020/03/26/negative-coronavirus-test-result-doesnt-always-mean-you-arent-infected/>: 'A negative result does not rule out COVID-19 and should not be used as the sole basis for treatment or patient management decisions.' ... 'When diagnostic testing is negative, the possibility of a false negative result should be considered in the context of a patient's recent exposures and the presence of clinical signs and symptoms consistent with COVID-19.'

⁵¹ Of course, if they are sick with something else they should also stay home.

employee should be directed to work from home, but that is not an option in relation to most farm jobs. If it isn't then ideally the employee would agree to take annual leave. If they refuse however — and depending on the circumstances — an employer would probably still have the power to direct them not to attend work for the quarantine period of 14 days, however it is likely that a permanent employee would still have to be paid. Again, this is a very tricky situation, so specific advice should be obtained.

Aside from those two circumstances, it is unlikely the employer will be entitled to issue directions to employees in relation to COVID-19 unless those directions are related to performance of work or attendance at a workplace. If, for example, an employee tells you that they intend to be traveling to a 'hot spot', it is unlikely the employer can object. But again, the circumstances will vary from case-to-case, and if in any doubt we would recommend you seek specific advice.

Finally, where working from home is an option, the employer should ensure that the employee completes a working from home assessment which specifically contemplates WHS risks — which remain the employer's obligation — and measures to minimise those risks. A sample form is linked to from the Business Victoria [page here](#) (under 'working from home'). The employer should also contact their insurance broker to confirm that workers compensation and other insurance covers working from home arrangements.

Leave Entitlements

Generally, an employee should be encouraged to use available leave entitlements if they do not attend work because of coronavirus, whether because they are quarantined, the worksite is closed, or they are sick.

In general terms:

- Annual or long service leave may be used by agreement⁵² if the employee is unable to work because they are observing quarantine.
- Personal leave will be available where the employee is sick, caring for a sick member of immediate family, or dealing with an unexpected emergency affecting that family member⁵³.

It should also be noted that on 8 April 2020 the Fair Work Commission introduced changes to all agricultural Awards to:

- Grant relevant employees unpaid leave if they need to be absent from work to comply with government restrictions (such as quarantine); and
- Allow employer and employee to agree for the employee to take twice the amount of leave at half-pay.

Those changes are currently slated to remain in effect until 31 December 2021.

Although casual employees are entitled to be absent from work without repercussion if they are sick, they are not entitled to any paid sick leave. Accordingly, a casual employee who has COVID-19 is not entitled to pay if they are unable to work. In addition, where their hours are reduced (potentially to nothing) because of business slowdown or isolation requirements they will not be entitled to pay.

⁵² Clause 23.7 of the Pastoral Award 2010 and clause 26.9 of the Horticulture Award 2010 allow employers to direct employees to take annual leave where they have accrued 8 weeks of more, provide the employee is not left with less than 2 weeks annual leave.

⁵³ According to ACCI: 'Previous case law around the meaning of a 'family emergency' suggests that it is likely to include providing care to a child whose school has been forced to close with little or no notice as a result of COVID-19. Therefore, an employee in this circumstance will likely also be able to access their personal leave for this purpose even if their child is not ill or injured.'

Industrial Relations

Workers Compensation

In relation to worker's compensation, Safe Work Australia provides guidance [here](#)⁵⁴ which indicates that a worker who contract COVID-19 may be covered by workers' compensation if they are unable to work because they contracted the virus at the workplace or in the course of their duties, unless they put themselves at risk through serious and wilful misconduct. Workers' compensation typically covers lost income and medical costs. Of course, you should contact your workers compensation insurance provider for specifics.

Stand Down

Under the Fair Work Act, an employer may temporarily 'stand down' an employee without pay for a discrete period, where the employees cannot be 'usefully employed'⁵⁵ because of 'a stoppage of work for any cause for which the employer cannot reasonably be held responsible.'⁵⁶ That is, where there is genuinely nothing for the employee to do for reasons which are clearly beyond the employer's control.

The FWO (here⁵⁷) advises that in the present context stand down may be available where:

- the business has closed because of an enforceable government direction (which means there is no work at all for employees to do even from another location); and
- there's a stoppage of work due to lack of supply for which the employer can't be held responsible.

Employers must be careful, however. For example, the provisions won't apply just because trade has slowed down and the business is not generating enough revenue to cover wages.

As a guide, before relying on the stand down provisions employers should ask themselves the following:

- Is there anything else the employee can do in the circumstances? Can they be redeployed (perhaps with some training)?
- Can you clearly establish that the employee is being stood down because there is no work?⁵⁸
- Are there any other options available to the employee, such as paid leave (see above)?
- Has the employee been given adequate notice and otherwise been treated fairly?

Finally, these principles can be adjusted under employment contracts or enterprise agreements, so be sure there are no other principles you should be aware of. Neither the Horticulture nor the Pastoral Award directly touches on stand down arrangements, but the consultation provisions (see page 15) would probably apply.

⁵⁴ <https://www.safeworkaustralia.gov.au/covid-19-information-workplaces/industry-information/home-services/workers-compensation>

⁵⁵ According to ACCI: 'Usefully employed' means that the employment will result in a net benefit to the employer's business by reason of the performance of the particular work done by the employee.

⁵⁶ Section 524(1)(c) of the Act.

⁵⁷ <https://coronavirus.fairwork.gov.au/coronavirus-and-australian-workplace-laws/pay-leave-and-stand-downs#stand-downs>

⁵⁸ i.e. not using it as backdoor to make the employee temporarily redundant.

Industrial Relations

Reducing Hours and Changing Operations

As a result of the spread of COVID-19 some employers may be considering varying their operations. For example, they may wish to mix-up shifts and alternate work times to reduce the risk of exposing employees or because of changes in demand patterns of their customers.

The capacity to vary rosters and shifts or to shorten hours will be largely controlled by the applicable industrial instrument (e.g. the modern award or enterprise agreement) or employment contract.

Clause 8 of both the Pastoral Award⁵⁹ and Horticultural Award⁶⁰ contain requirements for consulting with the employees where there is major workplace change which will have a significant effect on the employees, including terminations, restructures, and alterations of hours.

The consultation requirements include:

- Giving the employees notice of the changes, including the nature of the change and the likely effect on the employee;
- Discussing the changes with the employees, including the likely effect on them and measures to minimise adverse consequences; and
- Considering any matters raised by the employees about the changes.

Furthermore, under clause 8A the employee must consult about changes to rosters or ordinary hours of work. Those consultation requirements (which are less extensive) require that the employee be given notice of the changes and an opportunity to comment.

Finally, it may be useful to consider 'individual flexibility arrangements' (IFAs) in some circumstances.

Ending Employment

As a final option an employer may need to end an employee's employment. The rules for doing so are complicated and will vary from business to business and depend on the situation. General rules can be found on the FWO website here⁶¹.

The Horticulture and Pastoral Awards both contain specific provisions dealing with redundancies at clause 12.

Although not strictly an industrial relations consideration, bear in mind that terminating employment may have visa implication for skilled migrant workers you are sponsoring. Considering other options such as leave without pay may be more attractive.

However, terminating a person's employment is obviously always difficult, complicated and controversial, so again you would be strongly advised to consult with an industrial relations specialist, such as those identified above, before taking that difficult course.

⁵⁹ https://www.fwc.gov.au/documents/documents/modern_awards/award/ma000035/default.htm

⁶⁰ https://www.fwc.gov.au/documents/documents/modern_awards/award/ma000028/default.htm

⁶¹ <https://coronavirus.fairwork.gov.au/coronavirus-and-australian-workplace-laws/ending-employment-during-coronavirus>

Vaccines in the Workplace

Vaccines Generally

It's good business for farms to create safe and healthy workplaces. In addition to the moral and legal duties involved, good health and safety promotes business continuity, productivity and staff morale. Furthermore, as an industry it's in agriculture's interests to have open borders, an economy functioning with minimal disruptions, and a return to 'business as usual' as soon as possible.

In the present context, critical to those aims will be encouraging and enabling farmers and workers to get vaccinated against COVID-19.

As a minimum, employers should be taking steps to facilitate workers getting vaccinated.

- That will mean assisting workers to be properly informed about the vaccine, its availability and the consequence of being/not being vaccinated; [see here](#)⁶².
- It will also include ensuring, within reason, that workers have the time and opportunity to get the jab.

The overarching message is that farms should try to work cooperatively with their employees with respect to vaccines and fighting COVID-19. Ideally before any mandatory direction or decision is made the employer should talk to their employees and make reasonable efforts to reach a position which is agreeable to all.

Vaccines and Leave

There is *generally* no legal obligation to provide employees with pay or leave to get vaccinated unless it follows from a workplace direction. As such, if an employee wants to get vaccinated during work hours they may have to take annual leave or time off in lieu. However, that general position may be varied by employment contracts or industrial instruments (enterprise agreements or awards)⁶³.

That said, employers may wish to consider whether they will allow employees to get vaccinated with pay during work hours on a voluntary basis.

If, as a consequence of getting vaccinated, an employee develops symptoms of illness and is not fit for work then they are entitled to take personal leave while they recover.

Vaccines and Work Health and Safety

According to Safe Work Australia's (**SWA's**) guidance, it is 'unlikely' that employers have a legal power/obligation to require workers be vaccinated as a consequence of their (the employer's or the worker's) duties under WHS laws. That is because it won't typically be considered a 'reasonably practicable' step to take to eliminate/minimise the risk of exposure to COVID-19 in the workplace.

However, each business will need to assess the position for themselves. Furthermore, that guidance may change if, for example, the advice of the Australian Health Protection Principal Committee changes.

SWA's complete guidance on WHS laws and the COVID-19 vaccines can be [found here](#)⁶⁴.

Employees generally can't refuse to attend work because co-workers aren't vaccinated, although if there is a genuine reason to believe that they may get infected from a co-worker (e.g. because a co-worker is infected) then they will have a stronger case.

⁶² <https://www.health.gov.au/initiatives-and-programs/covid-19-vaccines>. Further information regarding communications about the vaccines is available here: <https://www.tga.gov.au/communicating-about-covid-19-vaccines>. And the covid19nearme.com.au website provides a map of vaccine sites and can be filtered by region. Note, however, that you will have to choose 'vaccine clinics' at the top left of the map as it displays 'exposure sites' by default.

⁶³ The agricultural awards do not alter the general position.

⁶⁴ <https://www.safeworkaustralia.gov.au/covid-19-information-workplaces/industry-information/general-industry-information/vaccination>

Vaccines in the Workplace

Vaccines and Employment Directions

The FWO has generated detailed and helpful advice in relation to vaccines and workplace rights and duties; [see here](#)⁶⁵.

According to that advice, in limited circumstances an employer may be able to direct employee to get the vaccine. Those circumstances include where:

- The employee has a legal obligation (e.g. pursuant to a public health order) to get vaccinated to do their job;
- The direction is enabled by an industrial instrument, such as an enterprise agreement or an industrial award (the agricultural awards do not); or
- It would be 'lawful and reasonable' for the employer to give the direction.

Whether a direction would be 'lawful and reasonable' should be assessed on a case-by-case basis, considering things like the nature of the workplace, public contact, etc.

To help businesses determine whether a direction would be 'lawful and reasonable', the FWO divided types of work into four 'tiers'.

- **Tier 1** is work where employees are required as part of their duties to interact with people with an increased risk of being infected with COVID-19 (for example, hotel quarantine or border control workers).
- **Tier 2** is work where employees are required to have close contact with people who are particularly vulnerable to the health impacts of COVID-19 (for example, health or aged care workers).
- **Tier 3** is work where there is interaction or likely interaction between employees and other people such as customers, other employees, or the public in the normal course of employment.
- **Tier 4** is work where employees have minimal face-to-face interaction as part of their normal employment duties (for example, where they are working from home).

According to the FWO guidance, directions to employees in Tier 1 or Tier 2 work are more likely to be lawful, whereas directions to Tier 4 workers are unlikely to be lawful. With respect to Tier 3 work:

where no community transmission of coronavirus has occurred for some time in the area where the employer is located, a direction to employees to be vaccinated is in most cases less likely to be reasonable; where community transmission of coronavirus is occurring in an area, and an employer is operating a workplace in that area that needs to remain open despite a lockdown, a direction to employees to receive a vaccination is more likely to be reasonable.

Deciding to direct an employee to be vaccinated should be treated as highly contentious. Unless there is a very clear and indisputable legal right/requirement to issue the direction, employers are strongly encouraged to (1) discuss it with the employee at length and give them plenty of opportunity to consider their position and (2) seek independent expert advice on the issue.

Employees may be able to refuse to employ/engage a person who has not been vaccinated and/or direct a *potential* employee to get vaccinated before hiring them. However, the employer must be careful not to breach laws which effect hiring, e.g. human rights and anti-discrimination laws, adverse action and general protections, etc. They should also be mindful of the rollout and availability of the vaccines.

If an employer has a legal right to direct an employee to get vaccinated then they may require an employee to provide evidence of their vaccination status, but not otherwise. Furthermore, to avoid breaching privacy laws they should not keep a copy of the evidence without the employee's consent. Detailed information is available from the Information Commissioners [website here](#)⁶⁶.

Finally, an employer can *incentivise* their workers to get vaccinated provided (generally speaking) the incentive is legal, does not direct an employee to a particular type of vaccine, and does not discriminate in respect to the persons who are entitled. [See here](#)⁶⁷.

⁶⁵ <https://coronavirus.fairwork.gov.au/coronavirus-and-australian-workplace-laws/covid-19-vaccinations-and-the-workplace>

⁶⁶ <https://www.oaic.gov.au/privacy/guidance-and-advice/coronavirus-covid-19-vaccinations-understanding-your-privacy-obligations-to-your-staff/>

⁶⁷ <https://www.tga.gov.au/communicating-about-covid-19-vaccines>

Useful Links

State and Regional Links

Victoria

[Victorian Government](#)

[WorkSafe Victoria](#)

New South Wales

[New South Wales Government](#)

[Safework New South Wales](#)

Western Australia

[Western Australian Government](#)

[Western Australian Worksafe](#)

Northern Territory

[Northern Territory Government](#)

[NT Worksafe](#)

South Australia

[South Australian Government](#)

[Primary Industries and Regions SA](#)

[SafeWork SA](#)

Tasmania

[Tasmanian Government](#)

[WorkSafe Tasmania](#)

ACT

[ACT Government](#)

Queensland

[Queensland Government](#)

[Workplace Health and Safety Queensland](#)

Agricultural & Commodity Links and Resources

[FarmHub](#)

[GrainGrowers](#)

[Grain Producers SA](#)

[Livestock SA](#)

[Shearing and Wool Production](#)

[Dairy Australia / Directory](#)

[Cotton Australia](#)

[Berries Australia](#)

[Canegrowers](#)

[Cattle Council](#)

[Ausveg](#)

[Avocados Australia](#)

Annex 1

COVID-19 Personal Disclosure Statement

EMPLOYEE DETAILS

Employee Name

Address

Telephone number

Email Address

Do you have any underlying health conditions that make you more susceptible to infection?	Yes	No
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If you have travelled, where did you travel, at what times, how did you travel, and who did you travel with?	Yes	No
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Have any of your immediate family or household members travelled overseas or interstate in the last 2 weeks? Is so where did they travel?	Yes	No
---	-----	----

If you have travelled, where did you travel, at what times, how did you travel, and who did you travel with?	Yes	No
--	-----	----

How do you get to work? (public transport, driving, walking)	Yes	No
--	-----	----

Do you have school aged children or children who attend day care?	Yes	No
---	-----	----

Do you have close contact with the elderly or immune compromised people?	Yes	No
--	-----	----

Do you have any symptoms of COVID-19? If yes, please describe them	Yes	No
---	-----	----

Have you been in contact with any person you think may have been infected with COVID-19 in the past 14 days?	Yes	No
--	-----	----

BUSINESS NAME

is collecting this information to help ensure your health and safety in the workplace given the current outbreak of COVID-19.

I acknowledge that the above information is correct and undertake to inform _____
of the following: BUSINESS NAME

- Any personal travel plans, including actual locations visited
- Of contact with any individual who is diagnosed with COVID-19
- If I am diagnosed with COVID-19
- If I have visited a known outbreak hotspot.
- Any other relevant information regarding potential exposure to COVID-19

Employee Signature

Date





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