



Attire and Footwear in Client Service Areas Policy

Occupational Health and Safety

Version 2

**Strategic Human Resources
Ageing, Disability & Home Care
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Human Services
Ageing, Disability & Home Care

Document approval

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1 What is the Purpose of this Policy?

This policy is to support the Ageing, Disability & Home Care (ADHC) commitment to ensuring the health and safety of all employees, clients, contractors, volunteers and visitors to agency workplaces. The key objectives of this policy are to:

- to the fullest extent, facilitate the elimination and/or minimisation of risks associated with attire and footwear in client service areas
- satisfy legislative requirements by compliance with the *Occupational Health and Safety Act 2000* and *Occupational Health and Safety Regulation 2001*.

2 Who Does this Policy Apply to?

This policy applies to all Ageing, Disability & Home Care employees, volunteers and contractors who work in or visit client service areas.

It replaces the *DADHC Occupational Health and Safety Appropriate Attire and Footwear Guideline, 2006*.

This policy does not replace policies/procedures relating to:

- corporate uniforms that may be provided by ADHC to ADHC employees
- specific personal protective equipment identified as a result of risk management processes and supplied by ADHC as a risk control measure.

3 Definitions

Client service area — a physical area, such as a client's home, ADHC facility or facility in the community where an ADHC employee is providing direct care services to clients. Direct care services may include tasks such as personal care, meal preparation, shopping, domestic duties, provision of therapy and community outings.

Employee — for the purpose of this policy an employee includes a contractor, volunteer or agency staff member who is engaged by ADHC to provide direct client care services.

4 Who is Responsible?

All ADHC employees have responsibilities in the implementation of this policy. This includes:

- Chief Executive and the Executive
- Regional Directors, Regional Executive Officers and CEOs (large residences)
- Managers
- Employees

Refer to **Appendix A** for specific responsibilities.

5 ADHC Client Service Areas

ADHC employees provide services to clients in a range of work environments such as:

- the client's home environment, including wet and dry areas
- outdoor areas, including access to the properties/facilities
- the community when on outings with clients or completing tasks such as shopping for clients
- ADHC facilities, including group homes, respite units and ADHC offices
- vehicles used to transport clients.

When providing services to clients, ADHC employees may complete the following tasks:

- carrying and moving objects of various sizes and weights, for example, domestic equipment when undertaking domestic tasks
- assisting clients to transfer to/from various pieces of furniture, equipment and vehicles
- assisting clients with personal care that could involve water, soap and bodily fluids
- assisting a client to move, for example, assisting a client to walk, pushing a wheelchair, rolling a client on the bed
- working with chemicals, including domestic cleaning fluids
- cleaning in wet and dry areas
- working with sharp objects, for example, knives in meal preparation or needles in clinical services areas
- working on a range of different internal floors and external surfaces
- driving vehicles to transport clients
- providing therapy to clients.

6 Risk Management Approach

The risk management process, as per the *DADHC Risk Management Policy, 2004*, is to be applied to attire and footwear worn in the performance of tasks completed in client service areas. A risk management approach is to be applied to all service types, including personal care tasks in wet and dry areas, domestic assistance, therapy provision and client services provided in the community.

The risk management process involves the following steps:

- Risk Identification
- Risk Assessment
- Risk Control
- Monitoring and Review

The risk management process is required to be conducted in consultation with employees and documentation maintained at all stages of the process. Refer to **Appendix B** for further details.

7 Risk Elements

7.1 Clothing

Employees are required to maintain a level of attire and footwear which is appropriate for their particular work environment and the tasks they are undertaking. Refer to **Appendix C** for specific examples in relation to the ADHC work environment.

7.2 Footwear

Appropriate footwear can reduce slips, trips and falls and injury to the feet.

Footwear must be worn at all times in direct client service areas. Employees must not be in bare feet at any time while at work unless there are special circumstances as outlined in the guideline.

Thongs, stilettos (long thin-heeled shoes) and open-toe shoes such as sandals are not to be worn in client service areas due to the risk of slips and trips and injuries to the foot when not sufficiently enclosed in the shoe.

Refer to **Appendix D** for specific examples in relation to the ADHC work environment.

8 Associated Policies and Legislation

Other policies and guidelines relating to clothing/attire and footwear in client service areas and the associated risks in ADHC include:

- *DADHC OHS Infection Control Policy, 2006*
- *DADHC OHS Infection Control Procedures, 2006*
- *DADHC Personal Protective Equipment – Guidelines for storage, fitting, removal and disposal, 2009*
- *DADHC Risk Management Policy, 2004*
- *Guidelines for the Prevention of Trips, Slips and Falls, 2005*
- *Policy and Procedures for the Home Care Service Corporate Uniform, May 2006.*

Related legislation and standards for reference include:

- *Compliance and Prosecution Guidelines, WorkCover NSW, March 2004*
- *Occupational Health and Safety Act 2000*
- *Occupational Health and Safety Consultation, Code of Practice, WorkCover NSW, 2001*
- *Occupational Health and Safety Regulation 2001.*

9 Further Information

Further information is available from the:

WorkCover NSW website

- *The Community Services Safety Pack – A Guide to Occupational Health and Safety, 2004*
- *Preventing Slips, Trips and Falls — Information for Workers, fact sheet.*

10 Appendix A - Who is Responsible?

All employees have responsibilities in the implementation of the *Attire and Footwear in Client Service Areas Policy*, 2010.

10.1 The Chief Executive and the Executive

Are responsible for:

- setting the policy direction in relation to attire and footwear requirements for working in client service areas
- monitoring the implementation and effectiveness of the policy.

10.2 Regional Directors, Regional Executive Officers and CEOs (large residences)

Are responsible for:

- monitoring and reviewing policy implementation and reporting on progress as required
- allocating resources for policy implementation. This includes resources for the provision of personal protective equipment where required
- implementing disciplinary procedures for non-compliance if required.

10.3 Managers

Are responsible for:

- identifying, assessing and controlling risks associated with employees' attire and footwear
- investigating all incidents and injuries reported
- maintaining all relevant occupational health and safety (OHS) related documentation, including local procedures and safe work procedures
- arranging consultation with employees on required risk control measures associated with attire and footwear
- providing instruction, information and training for employees on the requirements of this policy and implementation locally, including the use and fitting of personal protective equipment
- monitoring the compliance of employees with this policy, identifying if disciplinary procedures are required for non-compliance.

10.4 Employees

Are responsible for:

- complying with the *Attire and Footwear in Client Service Areas Policy*, 2010 and local guidelines and procedures
- ensuring their choice of attire and footwear is appropriate for their particular work duties and work environment

- participating as required in the identification, assessment and control of risks in relation to attire and footwear in client services area, including the development of safe work procedures
- reporting hazards identified or observed/experienced on the hazard report form and submitting the form to their manager within 24 hours
- not putting others at risk by their actions or omissions
- using personal protective equipment supplied by ADHC as directed or instructed.

10.5 Contractors/Volunteers/Agency Staff

Are responsible for:

- complying with the *Attire and Footwear in Client Service Areas Policy, 2010* and local guidelines and procedures
- ensuring their choice of attire and footwear is appropriate for their particular work duties and work environment
- avoiding putting themselves or others at risk by their actions or omissions.

11 Appendix B - Risk Management Approach

The risk management process, as per the *DADHC Risk Management Policy, 2004* is to be applied to attire and footwear worn in the performance of tasks completed in client service areas.

11.1 Employee Consultation

Timely consultation with employees is required throughout all stages of the risk management process, including risk identification, assessment and control. It should involve all the relevant stakeholders in addressing identified hazards or potential hazards regarding inappropriate attire and footwear.

11.2 Identification of Risks

Due to the variation of tasks undertaken and the range of client service environments, risk identification must occur on an ongoing basis to identify all potential risks in regard to attire and footwear.

11.3 Risk Assessment

The identified risk should be assessed following the *DADHC Risk Management Policy, 2004*.

11.4 Risk Control

Once the identified risks have been assessed action must be taken by managers, in consultation with employees, to eliminate or control the risks. The risk control hierarchy should be used to identify the most efficient control.

The risk control hierarchy identifies a range of engineering and administrative strategies, to be considered in order of preference, that aim to control the risk at the source.

The use of personal protective equipment is the lowest risk control option of the hierarchy of controls and should be considered as a last resort after all other risk control options have been exhausted.

11.5 Documentation

Documentation is to be maintained at all stages of the risk management process and in relation to the consultation and training that has occurred. Local procedures are to be developed where applicable in consultation with employees and documented by the manager.

11.6 Monitoring and Review

Once the risk assessment and identified risk control measures are in place they must be monitored and reviewed to ensure they remain applicable and effective. Monitoring should occur on a regular basis.

12 Appendix C - Risk Element: Clothing

Employees are required to maintain a level of attire (clothing) which is appropriate for their particular work environment and the tasks they are undertaking. This policy does not replace policies/procedures relating to:

- Corporate uniforms that may be provided by ADHC to ADHC employees
- Specific personal protective equipment identified as a result of risk management processes and supplied by ADHC as a risk control measure

12.1 Infection Control

In client service areas ADHC employees can be exposed to bodily substances, cleaning fluids and sharp objects. In order to minimise the risk of infection, standard precautions should be followed as per the *ADHC OHS Infection Control Policy and Procedures, 2006*.

12.2 Manual Handling

A significant number of tasks in client service areas involve manual handling (physical movement).

Employees completing manual handling tasks, such as domestic assistance and personal care tasks, should wear clothing that does not restrict or interfere with the physical movement or postures required to perform the tasks in a safe manner.

Employees should not wear clothing that it is likely to drag on the floor and cause a trip hazard, get caught in equipment or be easily grabbed, held or pulled by clients. This includes scarves/thin straps on clothing and dangling earrings and necklaces. Employees with long hair should tie it back to ensure it does not interfere or get caught when undertaking manual handling tasks.

12.3 Sun Protection

In providing client services ADHC employees may be required to conduct tasks in an outdoor environment. These may include client outings, domestic tasks such as hanging out the laundry, shopping or driving vehicles. Consideration should be given to the task and the time it is to be conducted to determine if exposure to the sun and the heat of the day can be reduced.

Employees should wear appropriate clothing for the climatic conditions, including temperature, weather and exposure to the sun. Use of hats, sunglasses, longer-sleeve clothing and sunscreen to protect from the exposure to the sun is advisable.

12.4 Wet and Cold Weather

ADHC employees are required to provide client services in inclement weather. If the client service is to be undertaken in low temperatures and/or wet weather, employees should wear clothing appropriate to the climatic conditions.

12.5 Pools

When undertaking hydrotherapy or recreational activities in a pool with a client, non-slip footwear and specific attire are required due to the wet environment.

12.6 Client Behaviours

Where clients have a history of sex offences or inappropriate behaviour, employees should be aware of their dress. This may include ensuring their midriff is not exposed and that clothing reduces the amount of the skin exposed. Consideration should be given to the type of skirts and shorts worn by employees.

12.7 Jewellery

Providing direct care services involves working in close proximity to clients and possibly coming into contact with their skin. Loose, hanging and large jewellery should be avoided as it may encourage the client to grab hold of or pull the jewellery.

Jewellery should also not have any sharp or protruding edges in case it scratches, marks or damages clients with fragile skin.

13 Appendix D – Risk Element: Footwear

Employees are required to maintain a level of footwear which is appropriate for their particular work environment and the tasks they are undertaking. Appropriate footwear can reduce slips, trips and falls and injury to the feet.

13.1 Infection Control

Footwear worn by workers in client service areas must be fully enclosed to reduce the risk of injury to the feet from bodily substances or chemicals that may be accidentally dropped or splashed onto exposed skin.

13.2 Slips, Trips and Falls

Client service areas have a range of floor surfaces, including tiles, wood, carpet and vinyl/linoleum in wet and dry areas. Client service is also provided in external environments which may have uneven and slippery surfaces.

Footwear should have a slip-resistant sole with a good tread pattern and provide adequate support with a rounded heel that has good contact with the ground.

13.3 Hit by Object (dropped on foot)

Footwear must be enclosed to protect feet from injury caused by falling objects, including sharp objects such as knives/syringes. In areas where sharps such as needles and syringes are used, a risk assessment should identify appropriate footwear.

13.4 Hit Object (kick object)

Footwear must be enclosed to protect feet from injury due to accidentally hitting or kicking an object, for example, hitting the corner of a piece of furniture when walking by or cleaning.

13.5 Wet Areas

When providing services to clients in wet areas such as a shower, footwear must be enclosed and have slip-resistant soles. The slip-resistant sole should have a patterned tread and a broad, rounded heel that has good contact with the ground. The fabric of the footwear should be water-repellant or water-resistant so that the employee is not walking around in wet footwear once the showering is complete.

13.6 Application to Specific ADHC Work Areas

There may be instances where, due to cultural beliefs and/or in sessions undertaken by therapists, a request is made to remove shoes. The employee cannot choose to remove their shoes but must undertake an OHS risk assessment with their manager and other employee/s involved with for the specific site and service provided.

The OHS risk assessment must be undertaken as per the *DADHC Risk Management Policy*, 2004 while taking into account the cultural beliefs and/or the benefit of

removing shoes to the therapy session. The risk assessment must identify any alternate options available prior to recommending removal of shoes. This risk assessment must be documented by the manager.

13.7 Cultural Beliefs Regarding Wearing of Shoes

If a client requests that employees remove their dirty shoes for cultural reasons prior to coming inside, alternate options must be considered prior to removal of shoes. For example, is it an option to wear an alternate pair of clean shoes while in the house rather than bare feet?

13.8 Therapy with Children

Community access therapists undertake therapy sessions with children. As part of the therapy specific equipment such as foam floor mats, trampolines or therapy balls may be used where the manufacturer recommends removal of shoes to avoid equipment damage. Sometimes the nature of therapy undertaken, such as demonstration of foot placements, requires the clients to look at the therapist's foot and shoes may affect the therapeutic benefit of the session.

A risk management approach must be taken as set out in Appendix B above. It may be an option for the therapist to wear more casual shoes, such as sneakers, in the therapy session rather than bare feet or business shoes.