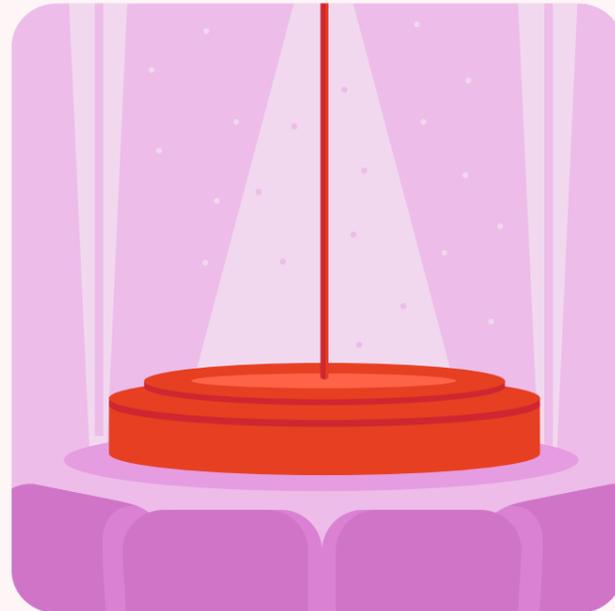


# SEX WORK 2024

## Work health and safety guidance



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# 1. Overview

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Following the commencement of the *Criminal Code (Decriminalising Sex Work) and Other Legislation Amendment Act 2024*, sex work is decriminalised in Queensland, is recognised as work and is therefore subject to the [Work Health and Safety Act 2011](#) (WHS Act).

Sex work means the provision of services for payment or reward and includes a person participating in a sexual activity with another person or the use or display of a person's body for the sexual arousal or gratification of another person.

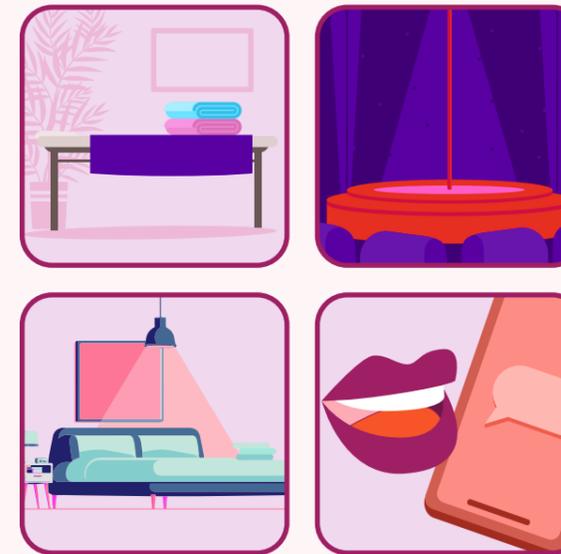
The sex industry includes all sex work workplaces. This includes, but is not limited to:

- brothels
- massage shops where sex work services are provided
- strip clubs
- any place, where sex work is performed by:
  - private sex workers
  - street-based sex workers
  - co-operatives/collectives of independent sex workers
  - escorts
  - topless (or nude) waiters or waitresses
  - online sex workers.

Work health and safety (WHS) laws apply to all industries and aim to protect the health, safety and welfare of workers and others. The Queensland WHS framework includes the [Work Health and Safety Act 2011](#), the [Work Health and Safety Regulation 2011](#) (WHS Regulation), [Codes of Practice](#) (which provide information on specific issues to help workplaces achieve legal standards) and guidance documents.

# 2. Work health and safety overview

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## 2.1 Who has work health and safety duties

Everyone in a workplace has health and safety duties under the WHS Act. A workplace is any place where work is carried out for a business or undertaking and includes any place where a worker goes or is likely to be, while at work. In sex work, this means any place where sex workers work.

A person can have more than one duty and more than one person can have the same duty at the same time.

The person with management or control of a workplace must ensure, so far as is reasonably practicable, that the workplace, the means of entering and exiting the workplace and anything arising from the workplace are without risks to the health and safety of any person.

**WHS Act section 19**  
Primary duty of care

**WHS Act section 20**  
Duty of persons conducting businesses or undertakings involving management or control of workplaces

**WHS Act section 27**  
Duty of officers

**WHS Act section 28**  
Duties of workers

**WHS Act section 29**  
Duties of other persons at the workplace



### Person conducting a business or undertaking (PCBU)

A **PCBU** has the primary duty under the WHS Act to ensure, as far as reasonably practicable, that workers and other persons are not exposed to health and safety risks arising from the business or undertaking.

The business or undertaking can be conducted alone or with others and can be not-for-profit or for financial gain.

A PCBU can be, but is not limited to:

- a chief executive officer or company director
- a sole trader (such as a self-employed person)
- an organisation (such as a company, an unincorporated association or a partnership)
- the business owner
- a contractor (further guidance on work health and safety duties for PCBUs who are working as part of a contractual chain can be found in the [Safe Work Australia Fact Sheet: WHS duties in a Contractual Chain](#)).

Examples of where a PCBU will have a health and safety duty include where:

- the PCBU engages workers to carry out work (for example, a sex work business owner engages sex workers to carry out services for clients)
- the PCBU directs or influences workers in carrying out work (for example, a sex work business owner setting what constitutes a ‘standard service’)

- other persons may be put at risk from work carried out in their business or undertaking (for example, clients of a sex work business).

A PCBU must eliminate risks in the workplace or, if that is not reasonably practicable, minimise the risks so far as is reasonably practicable. This includes:

- providing a safe work environment, including personal protective equipment (PPE)
- ensuring safe use, handling, cleaning, disinfection, disposal and storage of equipment and substances
- making sure facilities are well-maintained and at an acceptable standard
- giving workers any information, training, instruction or supervision needed to work safely
- monitoring the health and safety of workers and conditions at the workplace
- keeping an injury and incident register
- having a workers’ compensation policy and a return-to-work plan, where applicable (*note: Under Queensland’s Workers’ compensation laws, all PAYG employees and some contractors can be considered workers and must be covered by workers’ compensation insurance. For more information, see [Who should I cover? WorkSafe.qld.gov.au](#)*)
- consulting workers about work health and safety
- consulting, cooperating and coordinating with other duty holders, for example two sex workers working together in a co-op or collective
- where applicable and appropriate, informing clients about safe practices.

### Part 6 of the WHS Act

PCBUs are prohibited from engaging in discriminatory, coercive or misleading conduct against workers in prescribed circumstances. This includes discriminatory conduct against a worker who exercises their right under section 84 of the WHS Act to cease, or refuse to carry out, work where there is a serious health (physical or psychological) or safety risk.



### Officers

Officers, such as an owner of a brothel or an owner of a massage shop where sex work services are provided, have a duty to exercise due diligence to ensure the PCBU complies with the WHS Act and the WHS Regulation. This includes taking reasonable steps to understand the hazards and risks associated with the operations of the business or undertaking and ensure the business takes appropriate steps to eliminate or minimise risks to workers and other persons’ health and safety.



### Workers

Workers, including but not limited to sex workers, drivers or receptionists, have a duty to take reasonable care for their own health and safety and to not adversely affect the health and safety of other persons. Workers must comply with reasonable instructions, so far as they are reasonably able and cooperate with reasonable health and safety policies or procedures that have been notified to workers.

When personal protective equipment (PPE) is provided by the PCBU, the sex worker must, so far as they are reasonably able, use or wear and discard it in accordance with the information, instruction and training provided.

### Other persons at the workplace

Other persons at the workplace, like clients, must take reasonable care for their own health and safety and must take reasonable care not to adversely affect other people’s health and safety. They must comply, so far as they are reasonably able, with reasonable instructions given by the PCBU or a sex worker. This includes instructions to use or wear PPE.

**WHS Act section 84**  
Right of worker to cease unsafe work

**WHS Act section 104**  
Prohibition of discriminatory conduct

## 2.2 Rights of workers

Workers have rights and responsibilities under WHS laws.

A worker can include:

- an employee – for example, a receptionist in: a brothel, a massage shop where sex work services are provided or an escort agency.
- a contractor or sub-contractor – for example, some sex workers in brothels.

Workers, including but not limited to sex workers, drivers and receptionists, have a duty to take reasonable care for their own health and safety and to not adversely affect the health and safety of other persons.

Regardless of whether workers are classified as an employee, contractor or sub-contractor (or it is not clear); all sex workers and other persons who are carrying out work for a business, are clarified as workers under WHS legislation. For further information, refer to section 7 of the WHS Act.

Workers have the right to a safe and healthy work environment, including:

- saying no to unsafe work (for example, where there is a reasonable concern of a serious risk to their health and safety)
- speaking up to PCBUs about poor work conditions
- appropriate instruction, training and supervision
- the provision of necessary safety equipment and methods of safe disposal
- being consulted about safety issues in the workplace
- safe equipment and structures
- workers' compensation, where applicable (*Note: Under Queensland's workers' compensation laws, all PAYG employees and some contractors are workers and therefore must be covered by workers' compensation insurance. For more information, see [Who should I cover? WorkSafe.qld.gov.au](http://www.worksafe.qld.gov.au)*).

It is important that workers:

- ask for help if they are unsure how to safely perform the work
- follow safety instructions and work safely
- report hazards, unsafe situations, and injuries to a PCBU.

### Further information

#### Right to cease unsafe work

Under section 84 of the WHS Act, workers have the right to cease, or refuse to carry out, work where there is a reasonable concern of a serious health or safety risk. This right extends to both physical and psychological health.

Part 6 of the WHS Act prohibits PCBUs from discriminatory, coercive and misleading conduct against workers, prescribed in the WHS legislation. This includes discriminatory conduct against a worker who exercises their right under section 84 of the WHS Act.

#### Raising work health and safety concerns

Workers can:

- raise concerns with a PCBU through an issue resolution process (see **Section 2.5 Issue Resolution**); or
- raise workplace health and safety concerns with Work Health and Safety Queensland (WHSQ) (see **Section 2.6 Notifying WHSQ**)

#### Raising other concerns

If a worker wishes to raise concerns which are not related to work health and safety, support may be available from other organisations. For example:

- employment concerns, such as fair work/industrial relations matters and adverse actions (for example, unfair dismissal or not getting the correct pay or leave entitlements). For further information, contact the [Fair Work Ombudsman](http://www.fairwork.gov.au)

- crimes, such as robbery, any form of assault including sexual assault (sexual activity without consent, [including at a workplace](http://www.worksafe.qld.gov.au)), stealing (non-consensual removal or tampering with a condom), non-consensual filming, non-payment and drink spiking. For further information, contact [Respect Inc](http://www.respectinc.org.au) (Queensland's Government-funded sex worker organisation), the Queensland Police Service or a trusted medical practitioner
- general health and wellbeing issues, visit the [Queensland Health](http://www.health.qld.gov.au) website
- concerns about work arrangements, including employee versus independent contractor arrangements, visit the [Fair Work Ombudsman independent contractors webpage](http://www.fairwork.gov.au)
- issues relating to working as a migrant worker, access the [Working Safely in Australia](http://www.worksafelyinaustralia.gov.au) information sheet (which is translated into 22 languages).

#### Consent to sexual activity

Sex workers have a right to refuse a booking, a particular client and/or particular services according to the worker's own boundaries. This includes, for example, when a sex worker in a brothel wishes not to intro a client or when a stripper refuses to continue interaction with a client or group.

## 2.3 Consulting with workers and other duty holders

### 2.3.1 Consultation with workers

#### Consulting with workers

A PCBU must consult, so far as is reasonably practicable, with workers who carry out work for the business or undertaking and who are (or are likely to be) directly affected by a WHS matter.

This duty to consult is based on the recognition that worker input and participation improves decision-making about WHS matters and assists in reducing work-related injuries.

The broad definition of a ‘worker’ under the WHS Act means a PCBU must consult, so far as is reasonably practicable, with contractors and subcontractors and their employees, on-hire workers, outworkers and other people who are working for the PCBU and who are or are likely to be, directly affected by a health and safety matter.

Consultation involves sharing of information, giving workers a reasonable opportunity to express views and contribute to the decision-making process, taking those views into account before making decisions on health and safety matters and advising workers of the outcome.

Consultation with workers and their health and safety representatives (HSRs) is necessary at each step of the risk management process. Workers know which tools and activities contribute to their risks at work and may have practical suggestions or potential solutions.

Consultation should include encouraging workers to share their knowledge and experience of techniques and technologies which may better manage risks.

It is important for a PCBU to consult with workers as early as possible when planning to:

- introduce new tasks or change existing tasks
- select new equipment or remove current equipment
- refurbish, renovate or redesign existing workplaces
- carry out work in new environments.

PCBUs should also encourage workers to report problems with work and signs of risks and hazards immediately so that risks can be managed before an injury occurs.

If a worker does not understand or speak English well enough to engage in consultation, PCBU translation methods should be used to ensure workers are effectively consulted.

#### Encouraging workers to speak up about safety

A safety reporting process will help PCBUs identify health and safety issues, why they occurred and how to fix them.

#### **Why have a safety reporting process?**

A good safety reporting process:

- encourages workers to speak up about issues and potential issues
- provides opportunities for regular discussions about health and safety and for workers to participate in these discussions
- helps improve safe work procedures and training
- reports back on the actions taken to resolve issues
- makes it clear what the law requires in the case of a serious injury or death at work.

#### **What to report?**

Some things PCBUs should encourage workers to report include:

- injuries and fatalities
- near misses
- damaged or faulty equipment
- housekeeping issues such as spills not being wiped up immediately
- health and safety hazards
- suggestions for improvement.

By encouraging the reporting of hazards, near misses and maintenance issues, PCBUs can reduce the prospect of incidents occurring.

#### **Where do PCBUs start?**

Involve workers when developing a safety reporting process. Together, employers and workers should decide:

- what issues to report
- how to report them
- who to report the issues to
- how to fix issues.

Consider providing options for confidential reporting or alternative avenues for workers to make reports. The process does not need to be complicated. It could use an online form that can be submitted anonymously, a suggestion box or a dedicated notepad or whiteboard in a lunchroom. The most important thing is for workers to know that they are being listened to and that the PCBU is willing to act to resolve WHS issues.

For further information, see the [Work health and safety consultation, cooperation and coordination Code of Practice](#).

### 2.3.2 Health and safety representatives (HSRs) and health and safety committees (HSC)

Workers are entitled to take part in consultation and to be represented by an HSR and/or a health and safety committee who have been elected by the workers to represent their work group.

A worker may ask a PCBU to facilitate the conduct of an election for one or more HSRs to represent workers who carry out work for the business or undertaking.

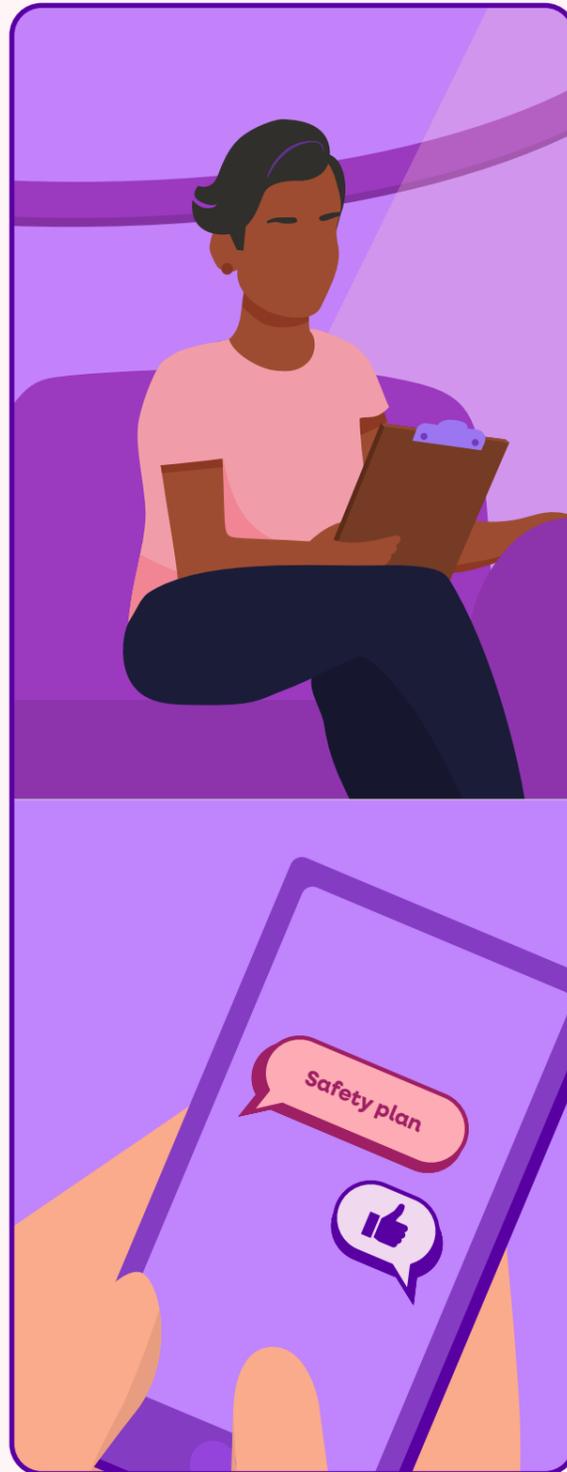
A health and safety committee brings together workers and management to assist in the development and review of health and safety policies and procedures for the workplace. HSRs and committees are also valuable where anonymity encourages engagement, for example, when identifying and controlling psychosocial hazards.

#### Further information

For further guidance about the election and function of HSRs and committees:

[Work health and safety consultation, co-operation and co-ordination Code of Practice](#)

[Health and safety representatives and health and safety committees](#)  
[WorkSafe.qld.gov.au](http://WorkSafe.qld.gov.au)



### 2.3.3 Consulting, cooperating and coordinating activities with other duty holders

The WHS Act requires a PCBU to consult, cooperate and coordinate activities with all other people who have a WHS duty in relation to the same matter, so far as is reasonably practicable.

There may be more than one PCBU involved in managing risks of sex work in the workplace. They may each have responsibility for the same health and safety matters, either because they are involved in the same activities or share the same workplace. A PCBU could share responsibility for a health and safety matter with other business operators who are involved in the same activities or who share the same workplace. In these situations, each duty holder must exchange information to find out who is doing what and work together in a cooperative and coordinated way so that all risks are eliminated or minimised as far as reasonably practicable.

For example, if sex workers are working together in a collective and sharing premises for work, each sex worker is a duty holder and should consult with the other sex workers on health and safety matters. This may include:

- deciding on what the emergency response procedures are and who is responsible for actioning reported safety hazards; and
- deciding how and when laundry and cleaning is completed.

WHS Act section 46  
Duty to consult with  
other duty holders

**WHS Regulation section 34**  
Duty to identify hazards

**WHS Regulation section 35**  
Managing risks to health and safety

**WHS Regulation section 36**  
Hierarchy of control measures

**WHS Regulation section 37**  
Maintenance of control measures

**WHS Regulation section 38**  
Review of control measures

**WHS Regulation section 297**  
Management of risks to health and safety

## 2.4 How to manage work health and safety risks

The risk management process involves:

- 1 identifying** hazards that pose a risk
- 2 assessing** the degree of risk created
- 3 controlling** the risk by implementing the most effective control measure that is reasonably practicable in the circumstances; and
- 4 reviewing** the control measure to ensure it is working as planned.

Managing WHS risks is an ongoing process that needs attention over time, but particularly when any changes affect work activities. Examples of when PCBUs should work through the risk management process include:

- responding to incidents (even if they have not caused injury but had the potential to cause harm)
- responding to health and safety concerns raised by workers, HSRs, committees or others at the workplace.

### Hierarchy of controls

The ways of controlling risks are ranked from the highest level of protection and reliability to the lowest. This ranking is known as the hierarchy of control measures (see **Figure 1**).

The WHS Regulation makes it mandatory for PCBUs to work through this hierarchy when managing risks. The hierarchy of control measures requires that PCBUs first aim to eliminate a risk. For example, using cordless vacuum cleaners to eliminate an identified trip hazard.

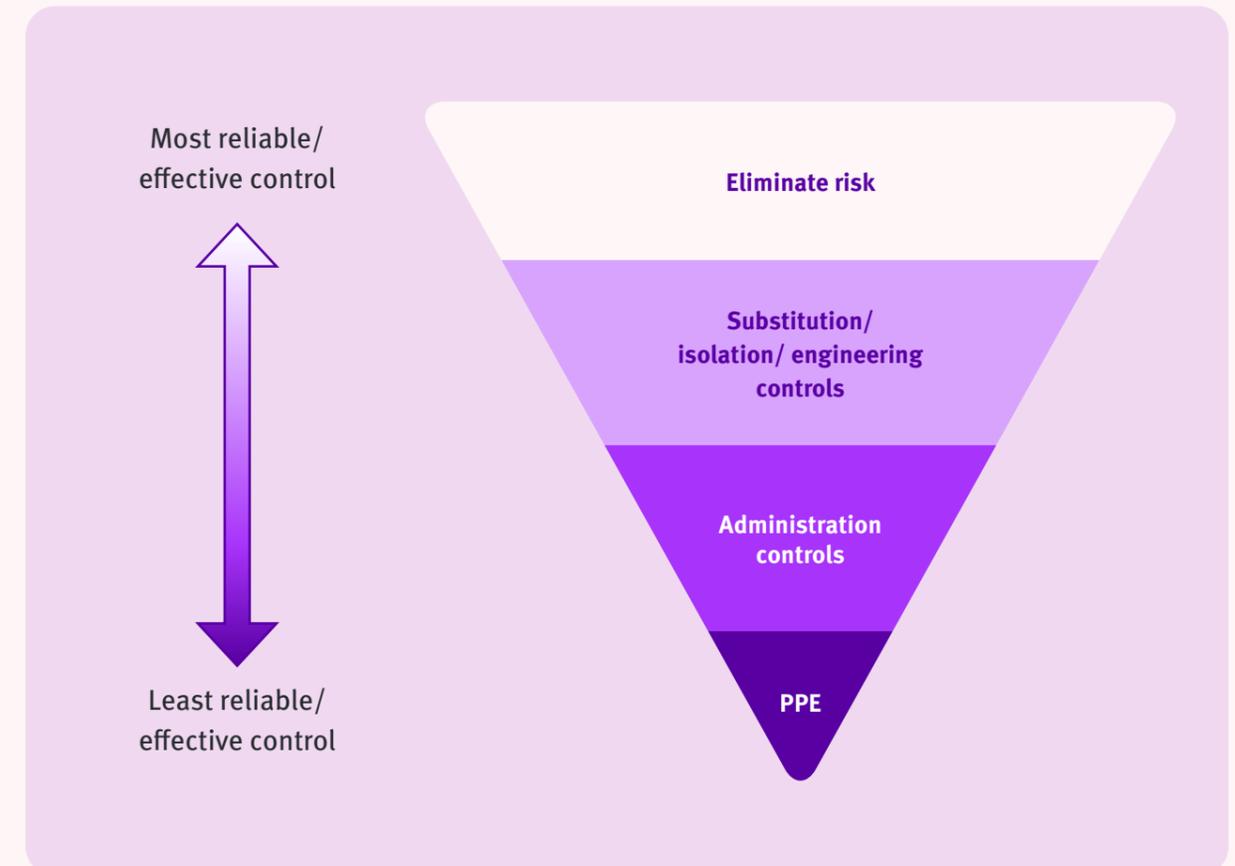
If it is not reasonably practicable to eliminate a risk, PCBUs must minimise the risk. Use one or more of the following approaches to minimise the risks:

- Substitute the hazard with something safer (for example, replace slippery flooring with a less slippery surface).
- Isolate the hazard (for example, store equipment correctly and/or use physical barriers to separate workers from trip hazards, provide physical barriers/safe spaces for workers only).
- Use engineering control measures (for example, implementing communication protocols for safety of sex workers performing offsite work, provide duress alarms to sex workers).

- If risks remain, PCBUs must minimise them as much as possible by applying administrative control measures. These may include:
  - having cleaning procedures regarding the management of wet floors to reduce the risk of slips, trips and falls
  - planning work times so that, where possible, workers are not working alone
  - providing training on the workplace's safe work procedures, including the use of any safety systems, strategies and/or technology.

Any remaining risks must be minimised with personal protective equipment (PPE). For example, provide sex workers with latex and non-latex condoms, dams and gloves in a range of sizes and water-based lubricants.

**Figure 1: Hierarchy of control measures**



## Maintain and review control measures

Control measures must be maintained so they remain fit for purpose, suitable for the nature and duration of work and are installed, set up and used correctly.

PCBUs must monitor and review control measures regularly to check their effectiveness. A review is also required:

- when a control measure is not effective (for example, when checks of PPE expiry dates are missed and PPE is compromised)
- before a change at the workplace (for example, the introduction of a new task, procedure or equipment that is likely to give rise to a new risk that could make the original control ineffective)
- if a new hazard or risk is identified
- if the results of consultation indicate that a review is necessary
- if a HSR requests a review, because there is reasonable belief that the PCBU has not adequately reviewed a control measure and this may affect the health and safety of a HSR member.

A review could determine:

- the effectiveness of the control measures (that is, whether the risk is still reduced by the control measure)
- whether the chosen control measure introduces a new hazard (for example, installing CCTV cameras in worker-only areas where privacy is required, such as lounge rooms, change rooms, bathrooms or locker rooms which may create psychosocial risks due to potential for breaches of privacy of sex workers)
- if all hazards have been identified
- if safety procedures are followed and accurately reflect how tasks are performed
- whether training and instruction provided to workers has been successful, suitable and adequate as per legislative requirements

- whether it is necessary to renew or upgrade equipment to better manage risks
- if there are any new technologies that are available that may not have been previously considered
- if the frequency and severity of incidents is reducing over time (suggesting the controls are effective) or if incidents have increased (suggesting controls may be ineffective).

If the control measure is not working effectively, it must be revised to ensure it is effective in controlling the risk.

## Ways to undertake reviews

One of the ways to undertake a review of control measures is to re-do the first two steps of the risk management procedure (that is, identifying the hazards and assessing the risk). Additional methods that can be used to review control measures include:

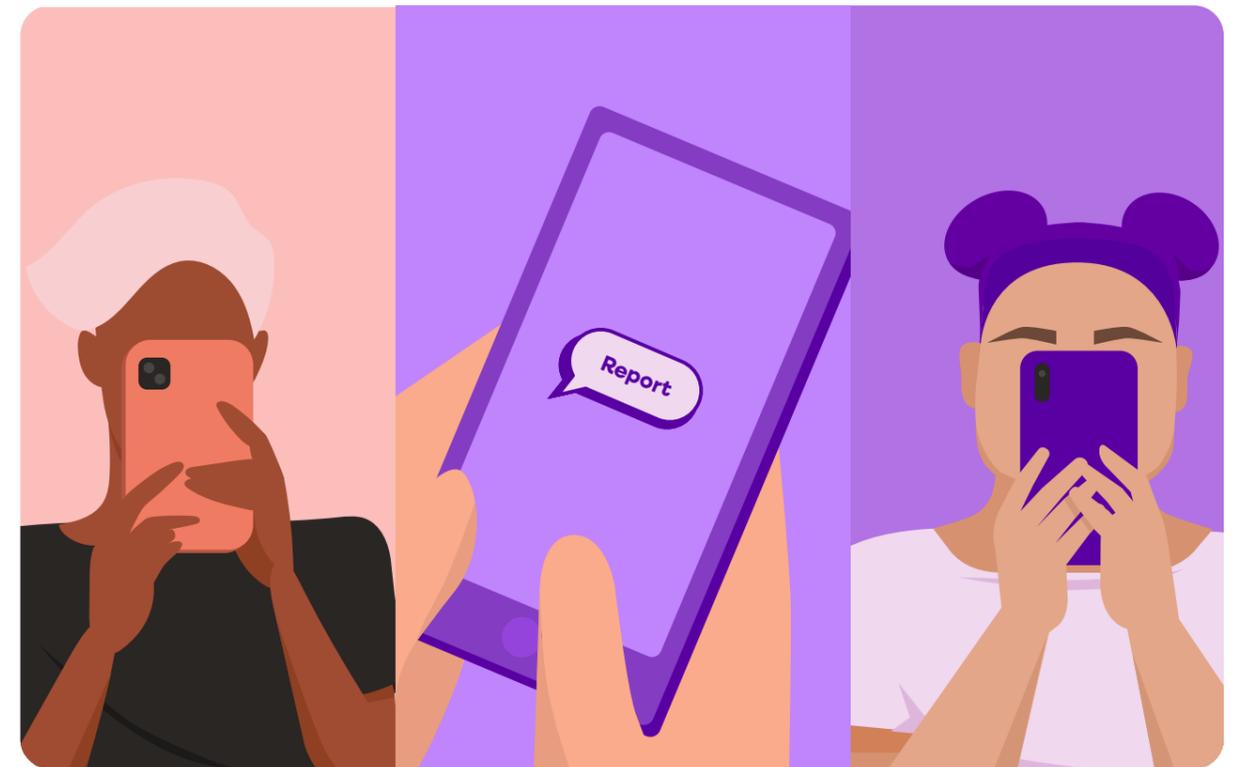
- consulting with workers
- referring to WHS legislation, codes of practice and guidance material, including [How to manage work health and safety risks Code of Practice](#).

A record of when to conduct a review of implemented control measures should be kept.

## Useful resources for managing health and safety risks

- [Hazard Identification checklist](#)
- [Worker consultation checklist](#)
- [Risk management plan](#)
- [Risk assessment template](#)

For further guidance, visit [WorkSafe.qld.gov.au](https://www.worksafe.qld.gov.au).



## 2.5 Issue resolution

The WHS legislation requires all business operators to develop an issue resolution process in consultation with their workers. If no specific process is developed, the WHS laws set out a default process which includes minimum requirements.

The procedure must be in writing and be communicated to all workers in the workplace.

The parties must make reasonable efforts to achieve resolution of the issue in accordance with the agreed or default procedure.

For further information on development and use of issue resolution procedures, see [Issue resolution processes | WorkSafe.qld.gov.au](#).

## 2.6 Notifying WHSQ

### Raising a safety concern about a workplace

Workers or anyone else in a workplace, can raise concerns about safety issues with WHSQ. This can include concerns such as:

- a risk to the health and safety of persons arising from a business or undertaking; and
- a suspected non-compliance with a WHS or electrical safety regulatory requirement.

Once a concern is raised, WHSQ will then assess what action to take in response to this request. To investigate how the workplace is managing health and safety, possible actions may include a visit to the workplace, a phone call or a letter.

To raise a concern, visit [Raise a workplace safety concern | WorkSafe.qld.gov.au](#) or contact WHSQ on 1300 362 128.

**Concerns can be raised anonymously.**

#### Raising other concerns

If a worker wishes to raise concerns which are not related to work health and safety, support may be available from other organisations. For example:

- employment concerns, such as fair work/industrial relations matters and adverse actions (for example, unfair dismissal or not getting the correct pay or leave entitlements). For further information, contact the [Fair Work Ombudsman](#).
- crimes, such as robbery, any form of assault including sexual assault (sexual activity without consent, *including at a workplace*), stealthing (non-consensual removal or tampering with a condom), non-consensual filming, non-payment and drink spiking. For further information, contact [Respect Inc](#) (Queensland's Government-funded sex worker organisation), the Queensland Police Service or a trusted medical practitioner.
- general health and wellbeing issues, visit the [Queensland Health](#) website.
- concerns about work arrangements, including employee versus independent contractor arrangements, visit the [Fair Work Ombudsman independent contractors](#) webpage.
- issues relating to working as a migrant worker, access the [Working Safely in Australia](#) information sheet (which is translated into 22 languages).

### PCBUs obligation to notify WHSQ of incidents

Under WHS laws, PCBUs are required to notify WHSQ if any of the following happens at the workplace or is caused by the running of their business:

- the death of a person
- a serious injury or illness of a person that is **reliably** attributable to carrying out work
- a dangerous incident (for example, an electric shock)
- a serious electrical incident (for example, if a person is killed by electricity)
- a dangerous electrical event (for example, unlicensed electrical work).

Further information is available at:

- [Notify us of an incident](#)
- [Confirm if an incident is notifiable](#)
- [Notify Workplace Health and Safety Queensland or the Electrical Safety Office](#)

## 2.7 Provision of information and training

PCBUs must train their workers in the work procedure to ensure that they are able to perform tasks safely. Training must cover the nature of the work, the associated risks and the control measures to be implemented.

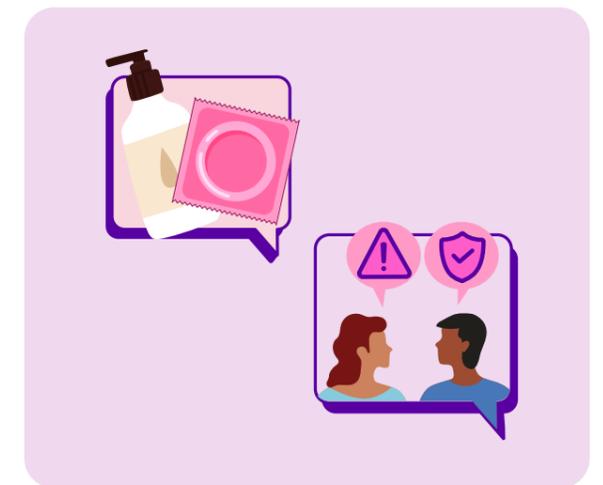
For sex workers, this training and information should include:

- rights and responsibilities of the sex worker (such as the requirement to use PPE and saying no to unsafe work)
- a tour of the workplace where applicable, including locations of all facilities, emergency exits, first aid supplies, CCTV screens, duress/personal alarms, clean linen and PPE
- guidance for sex workers new to a workplace on topics such as safe operations, how to perform visual sexually transmissible infections (STI) checks, operation of lighting, cleaning processes and responsibilities, PPE disposal and laundry.

Training, instruction and information must be provided in a form that can be understood by all workers. This may include the use of easily understandable diagrams or materials in the first language of the worker (where possible).

Information and instruction may also need to be provided to others who enter the workplace, such as being aware of any risks and the requirement for clients to use PPE.

If a worker does not understand or speak English well enough to comprehend and gain competence through the proposed training method, training should be provided in a language or a method that is understood by the worker.



#### Further resources

Peer education is the formalisation of traditional sharing of skills and information that has always occurred between sex workers in their workplaces. This includes the use of condoms, negotiating the use of condoms with clients, performing sex work safely and visual STI checks.

Further information, including requesting on-site visits by peer educators or information on training for new sex workers, can be sought from [Respect Inc](#).

# 3. Workplace hazard prevention



## 3.1 Building facilities

### Entry and exit

The means of entry and exit to and from the workplace must be safe. Where possible, this includes ensuring that workers and clients with disabilities and/or mobility aids can safely enter and leave the workplace.

Entries and exits should be slip-resistant under wet and dry conditions. Aisles, ramps, doorways and walkways should be at least 600 mm wide where reasonably practicable and always kept free of furniture or other obstructions. Where it is necessary to clearly define entry and exit routes, the boundaries of the route should be marked by a permanent line of white, yellow or other contrasting colour at least 50 mm wide or by glowing markers. Entry and exit routes, stairs and walkways should be adequately lit. Where reasonably practicable, stairs should have handrails.

For further information, see the [Managing the work environment and facilities Code of Practice](#), the [Guide to preventing slips, trips and falls at work](#) and *Australian Standard AS 1428.1 Design for access and mobility*.

### Work areas

The layout of work areas should have clear space between furniture, fixtures and fittings so that workers and clients can move about freely without strain or injury and evacuate quickly in case of an emergency.

In determining how much space is needed, PCBUs should consider the physical actions and equipment needed to perform any tasks in a comfortable posture and the need to move around while working. This also includes consideration for workers and clients with disability and/or mobility aids, where applicable and to the extent that is reasonably practicable.

For further information on manual tasks and the layout of work areas, see the [Hazardous manual tasks Code of Practice](#).

### Lighting

Lighting needs to be sufficient for all aspects of work to be carried out safely, including for workers to clearly see around them and any potential slip or trip hazards. This includes movement around workrooms, hallways, stairs, entrances and exits and the car park, during both day and night working hours.

Areas captured on CCTV should also be well lit for clients' faces to be clearly distinguishable on display screens for workers to view before meeting clients and for use in cases where footage is required for security purposes. Sex workers should be informed when and how the CCTV footage is captured. Assuring sex workers that the footage will not be disclosed unless legally required may minimise psychosocial hazards associated with privacy concerns.

For further information, see **Section 6.5 Lighting for bookings**, the [Managing the work environment and facilities Code of Practice](#) and the [Guide to preventing slips, trips and falls at work](#).

## **Thermal comfort**

Work should be carried out in an environment where the temperature range is comfortable for workers and suits the work they undertake. For further information and guidance on thermal comfort, see the [Managing the work environment and facilities Code of Practice](#).

## **Toilets**

Access to clean toilets must be provided for all workers while they are at work. Where reasonably practicable, toilet facilities should be provided for workers, rather than relying on access to external public toilets. Toilet facilities should be private and secure.

For workplaces within buildings, the [National Construction Code](#) (NCC) sets out the ratio of toilets to the number of workers and the specifications for toilets.

## **Kitchens**

Workers must be provided with access to hygienic facilities for eating, preparing and storing food. Depending on the size of a workplace, a range of facilities may be appropriate, which could include a dedicated meals area or allowing time for mobile workers to access eating facilities.

For further information, including kitchen facilities suitable for small and large workplaces, see the [Managing the work environment and facilities Code of Practice](#).

## **Showers**

Sex workers should have access to showering and drying facilities where reasonably practicable. Where access to showers is not possible, sex workers should have access to washing facilities.

For example, in work settings such as brothels, it is reasonably practicable to have shower facilities in each work room or each workplace.

Where reasonably practicable, shower or washing facilities should be provided for the sole use of workers, rather than relying on access to external public showers. Showers and/or washing facilities should be secure and offer privacy. Each shower should be supplied with clean hot and cold water, non-irritating liquid soap or another body cleaning product and clean towels for individual use.

Where sex work involves workers and/or clients with special needs, disabilities and/or mobility aids, the showers or washing facilities should be accessible to those workers and/or clients.

Sex workers who do not have access to showers or water for washing, such as where a worker does not work out of a fixed premises, may find the use of antibacterial hand rubs, wet wipes and tissues helpful until a shower or water to wash becomes available.

## **Hand washing facilities**

Hand washing facilities must be provided to enable workers to maintain a good standard of personal hygiene. Workers may need to wash their hands at different times, for example after visiting the toilet and before and after eating meals.

In work settings such as brothels, hand washing facilities should be available in each work room, as well as in common areas such as workers' bathrooms and kitchens.

## **Design of hand washing facilities**

Hand washing facilities should:

- be accessible at all times in work areas, eating areas and the toilets
- contain both hot and cold water taps or temperature mixers
- be protected from the weather
- be supplied with non-irritating liquid soap
- contain hygienic hand drying facilities (for example, having automatic air dryers or paper towels)
- be kept clean and have a regular cleaning schedule.

## **Massage tables, beds, mattresses and furniture**

### **Massage tables**

- Massage tables and other equipment should be at a height that is suitable for the worker and work activity to avoid discomfort, strain or other musculoskeletal injuries.
- A step stool should be provided to enable easier access to a massage table.
- Massage tables should be sturdy enough to support the weight of the person/s on the massage table, including clients and workers, without becoming unstable.
- Where sex workers stand on a massage table or on the client, a sturdy safety rail should be fitted to the wall or ceiling to provide support for the sex worker.
- Massage tables should be cleaned between each client.

### **Mattresses and bedding**

- Mattresses, bedding and furniture should provide enough back support so that services can take place without causing discomfort or strain to the body.
- They should be clean, undamaged and in good condition.

- Mattresses should be cleaned and replaced according to the manufacturer's guidance on the lifespan of the mattress, if not required sooner.
- Mattress and pillow protectors should always be used. These should be washed regularly, as per manufacturer's instructions, as well as when wet or soiled, and discarded and replaced if they cannot be effectively cleaned.
- Soft furnishings should be cleaned on a regular basis and after any spills.
- The weight and size of the mattress as well as the height of the bed should be considered. Heavier and larger mattresses require extra effort and more awkward posture to change bed linen and rotate mattresses. Low beds may also be difficult to get out of.

### **Furniture**

- Furniture and facilities should be in good working order.
- Broken or damaged furniture, fixtures, fittings and other equipment, including beds and chairs should be replaced or repaired promptly.
- Soft furnishings must be disposed of if they become infested with lice, bedbugs or other insects, or become wet and/or soiled and cannot be effectively cleaned.

## 3.2 Cleaning, linen and laundry

### Maintenance, housekeeping and cleaning

Keeping walking surfaces safe for access throughout the workplace requires a regular, reliable and timely system for maintenance, housekeeping and cleaning. An effective maintenance program keeps indoor and outdoor walk surfaces and lighting in good condition and minimises slips, trips and falls (STF) hazards.

Early reporting of problems and promptly addressing them is part of good maintenance. A suitable cleaning program results in effective removal of surface contamination and maintains the grip of flooring.

An effective cleaning program also involves preventing unsafe access to areas not yet dry, as well as a system that allocates cleaning responsibilities, including who is responsible and what responsibilities they have. This includes cleaning up spills on floors immediately, changing and laundering linens after each booking and regularly cleaning poles.

Housekeeping in the workplace involves keeping accessways and work areas clean and clear for safe movement. This includes storage of work materials, keeping obstructions out of walkways, providing waste bins where waste is generated and regular emptying of bins.

All workers should be trained in the significance of STF, their role and ways they can reduce the risk of STF. This includes cleaning and housekeeping procedures relevant to their job and when this is required. Routine cleaning of the workplace is also needed and can be undertaken by contract cleaners who need to be kept up to date with cleaning requirements.

### Linen and laundry<sup>1</sup>

PCBUs must provide enough linen, including sheets and towels, for use by sex workers and clients. Bed and/or massage table linen and towels should be changed and washed between each use. All linens and towels should be washed in a washing machine with hot water and laundry detergent, then dried thoroughly. Where washing machines have temperature control options, it is recommended that the temperature of the load is maintained at a minimum of 65°C for not less than 10 minutes or at a minimum of 71°C for not less than three minutes.

Linen may also be laundered through commercial laundry services.

Where sex work is occurring off premises, such as in escort or outcall situations, sex workers may consider bringing a clean sheet and towel and a plastic bag for the removal and transport of the linen after use.

### Hazardous chemicals

There are several chemicals used for cleaning, laundry and spa water treatment. Some of these products may be classified as hazardous chemicals which can cause harm if not stored, handled and used safely.

Hazardous chemicals may include flammable, ethanol-based sanitisers, spa water treatment chemicals, chlorine-based disinfectants for cleaning, laundry powders and caustic drain cleaners. Hazardous chemical products, subject to any exclusions or exemptions, must have a copy of the product's current Safety Data Sheet (SDS) from the manufacturer in a register at the premises. A register is simply a list of the hazardous chemical product names (for example, as shown on a retail pack) and the current SDS attached.

Safely managing small quantities of hazardous chemicals can be achieved by using and storing the product by following label instructions. Further information is available in the product's SDS.

A number of basic steps to safely manage such products include:

- keep packages closed when not in immediate use
- ensure lids are replaced tightly
- stow packages in a manner that minimises the risk of falling or being dislodged and damaged
- store on a solid shelf with a laminate surface for easy cleaning
- clean up spills immediately
- keep away from sources of heat
- do not keep with food or drinks
- never transfer into a food or drink container
- always ensure the original container label is attached and can be read
- the quantities of clean-up material should be based on the size of the largest packages kept at the premises (i.e. the volume and spread of the potential spill).

Waste generated during clean-up needs to be disposed of in a safe manner. For further information, see [Hazardous chemicals WorkSafe.qld.gov.au](https://www.worksafe.qld.gov.au).

## 3.3. Waste Disposal<sup>2</sup>

PCBUs must develop safe work procedures for collecting, storing and disposing of waste that contains blood and/or other bodily fluids.

Condoms, dams, gloves, soiled tissues, paper towels and the like, are not classified as 'contaminated waste' and can be collected in a lined bin with a lid and disposed of as ordinary household/office waste.

Waste disposal bins should be provided and located in convenient locations.

If sharps are used, safe work practices surrounding use and disposal of sharps should be developed to reduce the chance of workplace injury.

For example, sharps bins should be provided for safe sharps disposal at convenient locations. All sharps disposal containers must comply with *AS 4031: Non-reusable containers for the collection of sharp medical items used in health care*. It is not appropriate to dispose of sharps as domestic waste. PCBUs should also arrange for the safe disposal of sharps containers.

For further information, see the [Managing the work environment and facilities Code of Practice](#).

For information about Queensland Needle and Syringe Programs, go to [Queensland Needle and Syringe Program Queensland Health](#).

1. Adapted from SafeWork NSW, Health and safety guidelines for sex services premises in NSW, [Health and safety guidelines for sex services premises in NSW | SafeWork NSW](#), October 2022 and Work Safe Victoria, Sex Work, [Sex work | WorkSafe Victoria](#), November 2023.

2. Sourced from Health and safety guidelines for sex services premises in NSW, [Health and safety guidelines for sex services premises in NSW | SafeWork NSW](#)

# 4. Personal protective equipment<sup>3</sup>

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There are specific WHS laws requiring the provision and use of Personal Protective Equipment (PPE).

PCBUs must provide sex workers with suitable and adequate PPE, support and train sex workers to use PPE and must not prevent or discourage sex workers from using or accessing PPE. A sex worker has a right to refuse service to a client, including when a client refuses to use PPE.

PPE is clothing or equipment designed to be worn by someone to protect them from the risk of injury or illness. For sex work, PPE includes equipment such as condoms, water-based lubricants, gloves and dental dams, including non-latex options.

**WHS Regulation section 44**  
Provision to workers and use of personal protective equipment

**WHS Regulation section 45**  
Personal protective equipment used by other persons

**WHS Regulation section 46**  
Duties of worker

**WHS Regulation section 47**  
Duty of person other than worker

While visual STI checks on all clients are important, many STI are asymptomatic and may not be visible. To minimise the risk of transmission of STI, PCBUs must provide PPE to sex workers free of charge and in a range of sizes, including non-latex condoms, dams and gloves and water-based lubricants.

All PPE must comply with the relevant Australian Standards and should be checked regularly to ensure it has not expired. PPE should be stored in a cool, dry place, away from direct sunlight and in a place that is easily accessible to all sex workers in the workplace and not accessible to clients.

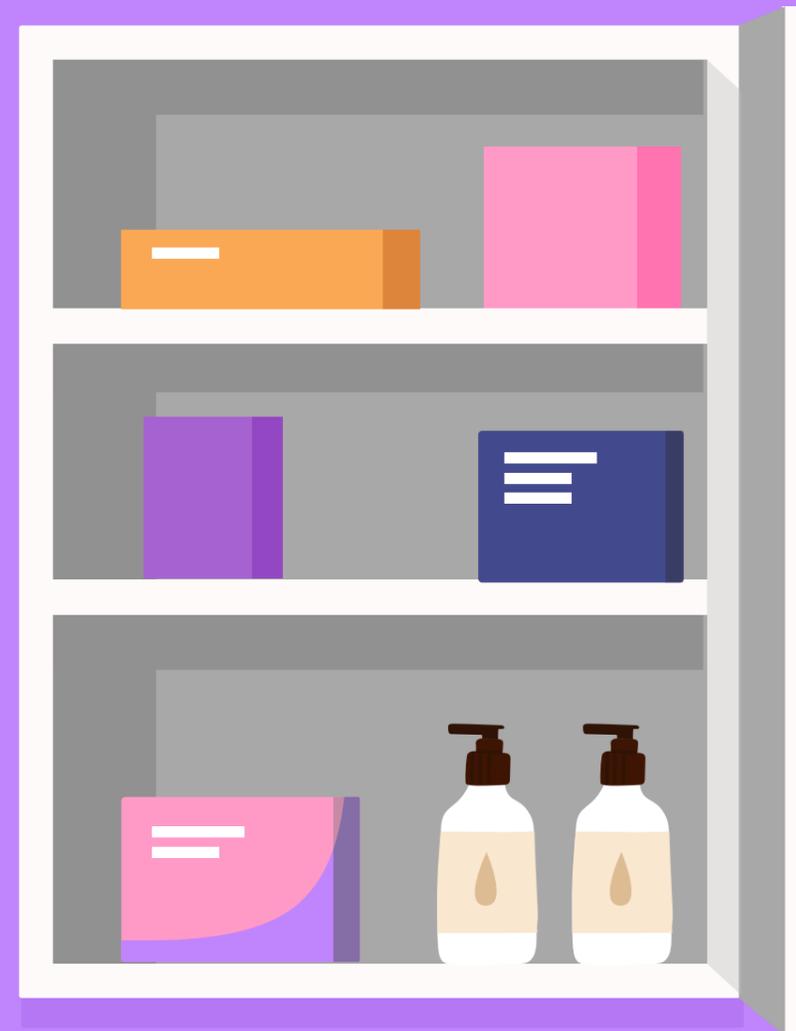
Sex workers must be provided with training and resources regarding the use, storage and disposal of used PPE.

Sex workers and clients have a duty to wear PPE provided to them.

#### Further information

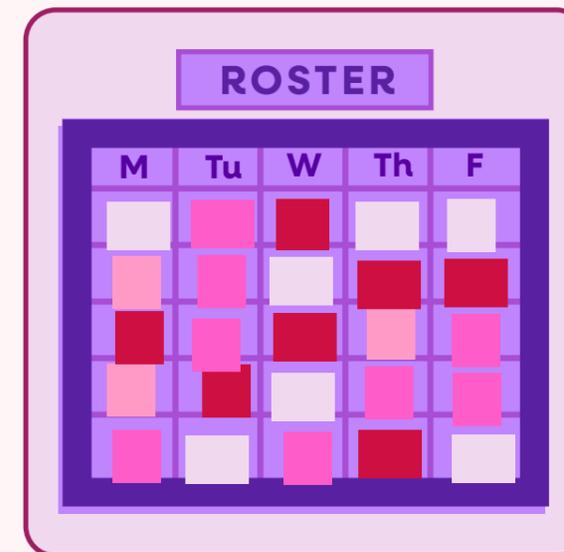
Training and resources for sex workers regarding PPE and its use, negotiating the use of PPE with clients and what to do in cases of condom slippage or breakage is essential.

[Respect Inc](#) has resources on these topics, which may be beneficial for sex workers.



# 5. Fatigue<sup>4</sup> and other psychosocial hazards<sup>5</sup>

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Managing psychosocial hazards and risks at work is just as important as managing physical risks. Psychosocial hazards are anything at work that may cause psychological or physical harm. These stem from:

- the way the tasks or jobs are designed, organised, managed and supervised
- tasks or jobs where there are inherent psychosocial hazards and risks
- the equipment, working environment or requirements to undertake duties in physically hazardous environments
- social factors at work, workplace relationships and social interactions.

More than one psychosocial hazard may be experienced at the same time. Psychosocial hazards may interact or combine to increase the overall psychosocial risk and should be considered together.

4. Fatigue is mental or physical exhaustion which stops a person's ability to perform work safely and effectively. It is a common psychosocial hazard at work, however can also be a physical hazard.

5. Sourced from WorkSafe QLD, Managing the risk of psychosocial hazards at work Code of Practice 2022, [WorkSafe.qld.gov.au](https://www.worksafe.qld.gov.au), January 2023.

The [Managing the risk of psychosocial hazards at work Code of Practice](#) is a practical guide on how to prevent harm from psychosocial hazards at work, including psychological and physical harm. The Code:

- applies to all Queensland workplaces
- provides information for PCBUs on how psychosocial hazards and risks can be controlled or managed and can be used to help decide what's reasonably practicable to reduce risk
- is a helpful resource for workers who may experience harm from psychosocial hazards, including psychological harm, at work
- includes psychosocial hazard examples, such as poor workplace relationships, interpersonal conflict, vulnerable workers, poor support, remote or isolated work, poor environmental conditions that create a stress response, traumatic events, violence and aggression, and bullying.

For further information, refer to the [Managing the risk of psychosocial hazards at work Code of Practice](#).



## 5.1 Fatigue

Fatigue is not *only* a psychosocial hazard. Fatigue is mental or physical exhaustion which stops a person's ability to perform work safely and effectively and is a common psychosocial hazard at work, as well as an effect of exposure to high job demands. Fatigue can adversely affect safety at the workplace. It can be caused by factors which may be work related, non-work related or a combination of both and can accumulate over time.

Potential causes of fatigue include:

- high job demands (for example, mentally and physically demanding work)
- long periods of time awake (for example, long shifts, long bookings or inadequate opportunities for recovery)
- inadequate amount or quality of sleep (for example, when on shift)
- regular work at night
- work requirements that incentivise working longer and harder
- poor work scheduling and planning
- workers performing multiple jobs/ secondary employment with little chance for recovery between shifts
- lengthy commuting periods to/from work
- inconsistent rostering of shifts.

## Fatigue controls

- Ensuring workers are not required to work extended hours by:
  - allowing for flexible shifts/hours, guided by the worker
  - ensuring shift work rosters provide for adequate sleep in a 24 hour and seven-day period
  - scheduling rest breaks away from the client on long, overnight or multi day bookings
  - including adequate rest breaks to allow workers enough recovery time (for example, time needed for travelling, eating, sleeping and socialising)
  - considering of rostering systems to monitor hours performed by workers and flag when workers may be at risk of experiencing fatigue/excessive job demands.
- Consulting with workers and representatives about managing fatigue matters, including:
  - planning and designing work schedules and rosters
  - making decisions on how to manage the risks of fatigue
  - changes to working hours, work schedules and procedures
  - making decisions about providing information and training on fatigue
  - after an incident or near miss where fatigue was a factor.
- Examining work practices to consider factors, such as the:
  - degree of choice and control workers have over work hours
  - pace of work and rest breaks
  - environment where there is an accepted practice of working long hours.

- Designing work to help manage the risk of fatigue may include:
  - work scheduling (for example, making sure workers take regular breaks)
  - shift work and rosters (for example, setting shift rosters ahead of time to allow workers to plan leisure time)
  - job demands (for example, introducing job rotation to limit a build-up of mental and physical fatigue)
  - environmental conditions (for example, ensuring thermal comfort)
  - non-work-related conditions (for example, developing a fatigue policy for all workers including managers and supervisors).

### Further guidance on fatigue

[Preventing and managing fatigue-related risk in the workplace guide](#)

[Managing the risk of psychosocial hazards at work Code of Practice](#)

[Guide for managing the risk of fatigue at work published by Safe Work Australia](#)

[Sex work and burnout information sheet published by Respect Inc](#)

## 5.2 Stigma and harassment

Sex work stigma can occur when negative attitudes or beliefs are exhibited about the work or workers. Stigma can lead to harassment and negatively impact sex workers' psychological wellbeing by making them feel ashamed, embarrassed and excluded.

In a workplace, the risk of stigma-related harassment can be minimised by having clear expectations about acceptable behaviours at work and implementing policies for work-related harassment. This may include the following:

- Adopting positive language when describing sex work or sex workers.
- Encouraging workers to speak up when they see stigma-related harassment.
- Supporting workers when they have been negatively impacted by harassment.
- Providing sex workers with safe spaces (e.g. worker only areas), where they can have physical and psychological distance from events and/or debrief about emotionally demanding situations.

Stigma-related harassment may occur towards workers inside the premises but may also come from neighbouring businesses as workers enter and exit the premises. Such harassment may include derogatory comments or taunts, asking intrusive questions about a person's body and jokes and innuendo. Workers, visitors and others at a workplace **must** comply with any reasonable behavioural standards instructed by a PCBU and adhere, so far as reasonably able, to site rules and procedures.

Work-related bullying is repeated and unreasonable behaviour directed towards a worker. This includes bullying by workers, visitors or others. Examples include spreading malicious rumours and belittling or humiliating comments. When work-related bullying occurs, workers may be hesitant to raise and discuss psychosocial hazards due to privacy or other concerns. This can particularly be the case where workers are in precarious work arrangements, such as casual employment. PCBUs may consider consultation processes that address such concerns, including through anonymous reporting. Workers **must** cooperate with reasonable policies relating to work-related bullying, work-related violence and aggression, sexual harassment or other forms of harassment.

For more information, see [Managing the risk of psychosocial hazards at work Code of Practice](#) and the [Mentally healthy workplaces toolkit WorkSafe.qld.gov.au](#)

## 5.3 Sex worker safety

Unfortunately, work-related threats of violence and verbal aggression are becoming a common psychosocial hazard in workplaces and particularly occur across customer-facing industries, including sex work.

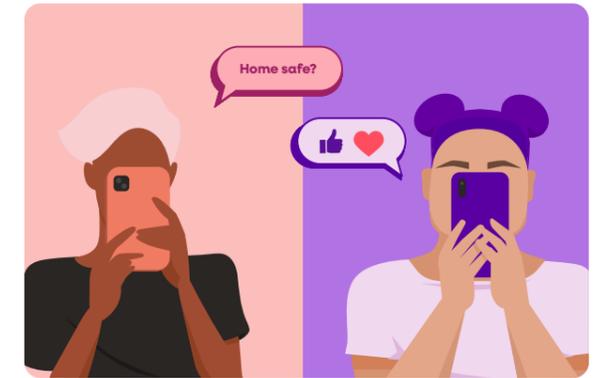
PCBUs are responsible for managing risks and hazards at work, including the risk of violence and aggression. A workplace is any place where work is carried out for a business or undertaking and includes any place where a worker goes or is likely to be, while at work. It is not just a building or a structure. This means that any place where sex workers work is a workplace.

Work-related threats of violence may include verbal or physical intimidation or bullying, abuse, sexual harassment or stalking. All workers should be trained in the safety systems and strategies of the workplace. The systems and strategies for managing hazards or risks will depend on the type of business or workplace and what works best for the workers in that workplace.

Sex workers should be supported to end bookings and leave if they feel unsafe at any point. Some sex workers may feel safe to see particular clients only in a doubles booking setting or to only offer some services.

PCBUs should have safety systems and strategies to minimise the risk of violence and aggression in the workplace. This includes policies and procedures which set out what to do at the time of an incident and after an incident occurs, including internal reporting and notifications required by external agencies (for example, WHSQ). Responses to work related violence and aggression will vary depending on the nature and severity of the incident. After an incident, those present may need to finish work early, debrief, seek support or arrange self-care.

6. Adapted from Vixen, [Sex work is work: Work, Health & Safety resource for independent sex workers and sex work workplaces](#), December 2023.



Response procedures can include information regarding what to do at the time of the incident, what to do immediately after the incident, how to manage the incident and information on incident reviews.

Emergency phone numbers should be easily accessible in all workplaces. It is recommended that contact details of Respect Inc, are also available to workers. Some recommended systems and strategies include:<sup>6</sup>

- CCTV or other security cameras installed in well-lit entrances, exits and reception areas where possible, for the purpose of providing footage and documentation of clients. Sex workers should know where cameras are located, where viewing screens are located, how recordings are stored, monitored, used and deleted. Viewing screens should be placed in areas where workers can view clients before deciding to meet them. CCTV cameras should not be placed in worker-only areas where privacy is required (for example, lounge rooms, change rooms, locker rooms, bathrooms)
- screening clients (for example, a client's name, phone number and address can be collected at the time the booking is made. Some sex workers also ask to see the client's photo ID)
- sex workers having easy access to a phone throughout the booking

- using a second phone or phone number for work to protect online and personal security
- where possible, not working alone
- using a pseudonym or work name, which may avoid unwanted attention or stalking outside of work
- establishing and enforcing a restrictive admission and access policy to venues for clients who are using verbal or physical violence
- enforcing a strict policy of removing and not readmitting clients to venues who are behaving unacceptably
- providing duress/personal alarms that workers can easily access and use in an emergency. When these are used, the following should be considered:
  - There should be a procedure for using and responding to alarms and all workers should be trained in the procedure.
  - The duress alarms and alarm responses should be regularly tested and batteries replaced where necessary.
  - If duress alarms are not provided, there should be a different mechanism provided to alert others when a sex worker needs help. Workers should be trained in the procedure to use and respond to this mechanism.
- ensuring suitable systems are in place for sex workers who work alone or remotely such as personal alarms and communication protocols. An example of a communication protocol is to phone a co-worker, management or a ‘buddy’ on arrival at the booking. This could entail:
  - sharing booking details—such as the address, booking in-and-out time and having a pre-arranged code word or phrase that represents a dangerous situation
  - arranging to call or receive a call, after a booking

- supporting and encouraging workers to report all incidents of violence to the PCBU and informing sex workers of their right to report to police if they wish to do so
- encouraging sex workers to access the support of Respect Inc
- acknowledging that sex workers have the right to refuse clients based on prior violent, abusive or threatening behaviour by that client
- ensuring workers who have experienced a violent work situation receive any medical treatment, legal support and counselling services they require
- providing secure, lockable facilities in which workers may leave their clothes, personal effects and valuables while they are working
- providing lockers or other suitable storage for clients’ personal items (such as phones and backpacks) away from where the booking takes place
- security screen doors to provide a level of protection for sex workers working in residential areas
- training workers in situational risk assessments of the environment.

### What to do at the time of an incident

Response procedures may include instructions for workers to:

- follow work procedures for responding to violence and aggression
- use calm verbal and non-verbal communication, de-escalation and distraction techniques
- seek support from other workers
- ask the aggressor to leave the premises
- know when to set off a duress alarm if available or otherwise communicate the need for help
- retreat to a safe location.

### What to do immediately after an incident

Response procedures may include processes for PCBUs to:

- ensure that everyone is safe
- provide first aid or seek urgent medical attention where necessary
- provide individual support where required, including practical, emotional and social support. This may include a debrief after the incident for affected workers, offering a referral to Respect Inc for assistance in reporting potential criminal offences or accompanying workers to seek assistance from the police or ambulance services
- where applicable, report relevant information to relevant authorities
- notify WHSQ if the incident results in a work-related death, a serious injury or is a dangerous incident.

Refer to **Section 2.6 Notifying WHSQ** for information on incident notification, including site preservation.

### Incident management

Response procedures may provide information on incident management including:

- emergency and evacuation plans that outline how to respond to immediate safety issues
- systems for communication and coordination and accessing medical treatment
- reporting procedures and incident investigation
- worker support
- sanctions or responses to aggressors (for example, a referral for criminal investigation or clinical review, safety or security assessment, refusal or restriction of future service).

### Incident reviews

Reviewing an incident of work-related violence and aggression to identify contributing factors will help determine how to prevent a similar incident recurring, how to respond to future incidents and whether any control measures need to be reviewed. It also provides the opportunity to ensure follow-up support for workers.

PCBUs should consult affected workers about the incident when considering ways to eliminate or minimise the risk of future incidents.

#### **Further information**

For further information, see:

- [Managing the risk of psychosocial hazards at work Code of Practice](#)
- [Violence and aggression | WorkSafe.qld.gov.au](#)
- [For information and resources about general health and wellbeing, see Queensland Health](#)

[Respect Inc](#) may also be able to assist with reporting incidents to police or finding other sex worker-friendly services.

## 5.4 Remote/isolated workers

Remote or isolated work is work that separates someone from other people and can become a psychosocial hazard. This can make it harder to get help including medical assistance and emergency services. This can be due to location, time or the nature of the work being done. In some situations, a worker may be working alone for a short time. In other situations, the worker may be working alone for days or weeks in remote locations, for example sex workers doing outcalls, long or multiple day bookings or touring workers.

### Risks of remote or isolated work

The risks of remote and isolated work are that workers:

- may not have access to telecommunications
- may not be able to get help in an emergency
- are more vulnerable
- may be at a higher risk of experiencing work-related violence and aggression
- might not receive important information, training or instructions
- may be more likely to suffer psychological distress (such as anxiety, stress, fear and depression). They could be at higher risk of harm due to:
  - the negative impact working away from home can have on social and familial relationships
  - feeling excluded and disconnected because of the lack of social, emotional and practical support from colleagues.

### Risk assessment

Some of the factors that should be considered when assessing the risks are outlined in **Table 1**.

**Table 1:** Common risk factors for remote or isolated work

<b>Time</b>	<ul style="list-style-type: none"><li>▪ The length of time the person needs to be working alone to do the job.</li><li>▪ The time of day when a person may be working alone (for example, work during the night may increase the hazards).</li></ul>
<b>Communication</b>	<ul style="list-style-type: none"><li>▪ What forms of communication does the worker have access to?</li><li>▪ Are there procedures for regular contact with the worker?</li><li>▪ Will the emergency communication system work properly in all situations?</li></ul>
<b>Location</b>	<ul style="list-style-type: none"><li>▪ Is the work in a remote location that makes immediate rescue or attendance of emergency services difficult?</li></ul>
<b>Nature of the work</b>	<ul style="list-style-type: none"><li>▪ Is fatigue likely to increase risk? For example, with long bookings or shifts.</li><li>▪ Is there an increased risk of threats of violence or verbal aggression when workers must deal with other persons by themselves?</li></ul>
<b>Skills and capabilities</b>	<ul style="list-style-type: none"><li>▪ What is the worker's level of work experience and training?</li><li>▪ Is the PCBU aware of pre-existing medical conditions that may increase risk?</li></ul>

## Risk controls

PCBUs and workers can work together to reduce the risks of remote and isolated work.

PCBUs have a duty, so far as is reasonably practicable, to:

- put measures in place to protect remote and isolated workers from risk;
- make sure workers can communicate effectively and get help if needed; and
- ensure no other persons' health or safety is put at risk through the PCBU's business or undertaking.

## Measures to reduce the risks of remote work

Some examples of the measures that should be considered to reduce the risks of remote work are outlined in **Table 2**.

### Steps sex workers can take to stay safe include:

- telling someone where they are going and when they will return
- using communication equipment to stay in touch, for example a mobile phone
- taking enough water and food
- have a call-in system
- have a first-aid kit and training in how to use it
- access to an emergency position-indicating radio beacon (EPIRB) or GPS tracking system
- not working alone.

### Further guidance

For further guidance on managing remote or isolated work, see:

- [Managing the risk of psychosocial hazards at work Code of Practice](#)
- [Managing the work environment and facilities Code of Practice](#)

**Table 2:** Measures to reduce the risks of remote work

<b>Communication systems</b>	The type of system chosen depends on the distance from the base and the environment in which the worker will be located or through which they will be travelling.
<b>Movement records</b>	Knowing where workers are expected to be can assist in controlling the risks, for example call-in systems.
<b>Check-in apps for workers</b>	PCBUs may consider apps that have features such as GPS location and last known location, scheduled check-ins, emergency check-ins, automatic worker down detection and a panic button.
<b>Training, information and instruction</b>	Workers need training to prepare them for working alone and, where relevant, in remote locations. For example, training in using communications systems, administering first aid, obtaining emergency assistance.
<b>First aid</b>	PCBUs have specific obligations under the WHS Regulation in relation to first aid requirements in the workplace. Further guidance regarding first aid and supplying first aid kits is in the <a href="#">First aid in the workplace Code of Practice</a> .
<b>Buddy system</b>	Some jobs present a level of risk that workers should not work alone, for example jobs where there is a risk of violence.
<b>Workplace layout and design</b>	Workplaces and their surrounds can be designed to reduce the likelihood of violence, for example by installing monitored CCTV in areas accessible by clients and enhancing visibility and security.

# 6. Working safely



## 6.1 Sexual health<sup>7</sup>

Contributing factors to good sexual health outcomes for sex workers include access to:

- peer education
- PPE
- vaccinations
- free, anonymous and stigma-free testing
- a supportive work environment to implement safer sex practices in bookings.

Good sexual health is maintained by regularly visiting a sexual health care provider of their choice for sexual healthcare and screening appropriate to their individual needs.

The WHS legislation does not contain provisions relating to medical examinations for sexual health testing, including intervals of testing or disclosure of personal information. The frequency of sexual health assessments should be determined by the individual sex worker's health needs and their sexual health care provider.

### Further information

For further information about sexual health testing, STI and blood borne virus (BBV) prevention, symptoms, treatment, contraception and cervical screening, see:

- [Queensland Health's sexual health website](#)
- [The Scarlet Alliance Red Book Online](#) (Published by Scarlet Alliance, Australia's Government-funded peak body for sex worker organisations)
- [Respect Inc](#) may also be able to assist with further information regarding sexual health, testing and treatment, frequency of testing, privacy of information and referrals to sex worker-friendly sexual health and medical practitioners.

<sup>7</sup> Adapted from SafeWork NSW, Health and safety guidelines for sex services premises in NSW [Health and safety guidelines for sex services premises in NSW | SafeWork NSW](#), October 2022.

## 6.2 Hygiene

### Sex worker hygiene<sup>8</sup>

Sex workers should wash their hands before and after conducting visual STI checks on clients (gloves should also be provided), after disposing of used PPE, before and after eating or using the toilet and after every booking.

Where hand basins are not accessible for sex workers, such as in street-based sex work or other off-premises work, sex workers may consider using antibacterial wipes or alcohol-based hand rubs to clean hands after a booking.

### Client hygiene

Sex work workplaces should provide facilities and products to ensure client hygiene. These should include showers, hand basins and clean linens. Products such as tissues, mouthwash, deodorant and wipes may also be provided. Mouthwash should be taken from a cup that can be disposed of or cleaned between users. Sex workers should be supported to mandate that clients use these facilities before a service takes place.

Sex workers doing escort or other offsite work should be encouraged by the PCBU to leave a booking if the offsite workspace (for example the client's home or a hotel room) is not at a safe level of cleanliness.

## 6.3 Visual sexually transmitted infections (STI) check<sup>9</sup>

A visual STI check is a check of a client's body to look for signs and symptoms of potential sexual health issues, including STI, broken skin or other sources of transmission or infection. It is a way for sex workers to minimise risks associated with each booking.

During a visual STI check, a sex worker should look at the client's:

- genital area
- anal area
- mouth
- skin (especially thighs, groin, buttocks and hands).

A lack of visible symptoms does not necessarily mean that a client does not have STI or blood-borne virus (BBV). It is important to remember STI frequently have no signs or symptoms.

Using PPE is the best protection from STI and BBV, even when there are no visible signs when a sex worker checks the client.

It is also possible that a person may have variations in their skin that look like STI symptoms.

Where sex workers are working together, a second opinion may be sought of the other sex worker. However, a second opinion should not be used to pressure a sex worker into performing the service if they still do not feel safe to do so.

Visual STI checks are just one of many things a worker can do to protect their health at work and should be combined with other prevention tools like using PPE.

It is recommended that a visual STI check is performed with all clients, no matter what genitals or gender identity they may have, under sufficient lighting.

### Further resources

Providing information and training on visual STI checks is essential. Further resources on this topic include, but are not limited to, information published by:

- [Respect Inc](#)
- [Scarlet Alliance](#)
- [Queensland Health](#).

### Doing a visual STI check

Checking clients for visible signs of STI is common practice for sex workers, particularly if they offer full service (penetrative sex) or oral sex. Checks can be done as a regular practice at the start of the booking or more discreetly, depending on where and how a sex worker works.

The best time to check a client is before they have a shower or go to the toilet as showering or urinating can clear any discharge that may be present. It can take up to half an hour for any discharge to build up and be noticeable again.

### What to look for during a visual STI check

- sores (including in or around a client's mouth)
- blisters
- rashes (or other changes in skin appearance, colour or texture)
- warts
- lumps
- bleeding
- unusual discharge
- swollen glands
- pubic lice.

If a sex worker believes a client may have STI, they may offer an alternative service and recommend the client visit a clinic for tests and treatment before they come back. It can be useful to keep some contact cards from a local sexual health clinic on hand to give to clients. The sex worker may also refuse the service.

### Further resources

Handling conversations with clients about suspected STI may be complex. [Respect Inc](#) can provide further support and information about how to handle these conversations.

### What to do if a sex worker might have been exposed to an STI

If a sex worker thinks they may have been exposed to an STI, it is important they look after themselves and get tested within the recommended timeframe.

### Further information

- [Respect Inc](#) may provide contacts to sex worker-friendly medical practitioners or sexual health clinics
- [Queensland Government Sexual Health Service](#)

More information about STI is available in the [Scarlet Alliance Red Book Online](#) and on [Queensland Health's website](#).

8. Adapted from SafeWork NSW, Health and safety guidelines for sex services premises in NSW, [Health and safety guidelines for sex services premises in NSW](#) | SafeWork NSW, October 2022.

9. Adapted from Scarlet Alliance, How to Check Clients for Visible Signs of STI, [redbook.scarletalliance.org.au/checking-clients](#)

## 6.4 Cleaning and use of sex toys

It is recommended that each sex worker have their own toys which are not used by other sex workers. Cleaning and use of sex toys should be in accordance with manufacturers' advice.

Some sex toys can be covered with condoms during use, making cleaning them easier. Condoms covering sex toys should be removed, discarded and replaced for each person using the toy. Toys should be cleaned between each use.

The way in which a toy can be cleaned will depend on what it is made of. Some sex toys may only be cleaned using sex toy cleaner or other specialised products for the materials they are made from.

Other ways to stay safe when using sex toys include:

- keeping sex toys clean
- choosing sex toys that are non-porous and easy to clean
- discarding sex toys that are scratched or damaged making them difficult to clean.

To ensure that sex toy products are covered by Australian consumer and product safety regulations, it is recommended that sex toys are purchased from Australian-based retailers, manufacturers or importers.

### Further information

For further information, refer to manufacturer's instructions.

[Respect Inc](#) may also be able to provide additional guidance relating to the cleaning of sex toys.

## 6.5 Lighting for bookings

A sex work business must provide and maintain sufficient lighting for sex workers to easily perform a visual STI check on the client and to inspect PPE to ensure it is in working order.

This includes lighting in a building or provided workspace, and when a sex worker is working in any other location, such as visiting a client's home. Additional light sources such as a lamp may be needed if fixed lighting is not sufficient. If a sex worker is working in another location, PCBUs should ensure the sex worker has a portable and adequate light source such as a small torch or mobile phone torch.

For further information on lighting for building facilities, see **Section 3.1. Building facilities**, the [Managing the work environment and facilities Code of Practice](#) and the [Guide to preventing slips, trips and falls at work](#).

## 6.6 Hazardous manual tasks<sup>10</sup>

Manual tasks performed by sex workers include massaging a client, changing bed linen (especially on heavier and large mattresses) and handling wet linen. Some manual tasks are hazardous and may cause musculoskeletal disorders (MSD). A task could involve more than one risk factor that can contribute to MSDs. Where several risk factors are present, the risk of MSD increases significantly. MSDs are the most common workplace injury across Australia.

Injuries can occur when a task requires a person to lift, lower, push, pull, carry or otherwise move, hold or restrain any person or thing involving one or more of the following:

- repetitive or sustained force
- high or sudden force
- repetitive movement
- sustained or awkward posture.

These factors directly stress the body and can lead to an injury.

A PCBU should carry out a risk assessment for any manual tasks that have been identified as being hazardous unless the risk is well-known and appropriate control measures are known. Workers must be consulted as part of this process as they can provide valuable information about work that results in discomfort and muscular aches and pains.

Some examples of how the risk of MSD can be minimised include:

- beds and mattresses that have adequate back support to allow for a variety of activities to be done comfortably to avoid strain on the body
- massage tables that are at comfortable heights for workers and allow workers to avoid awkward postures

- bondage and discipline equipment that is well designed, fit for purpose and adjustable
- adequate information, training and instruction provided to workers on use of all equipment
- extra pillows may be provided for propping/supporting body parts as required
- the use of tools such as massage rollers or hot/cold stones for longer massages
- using toys instead of repetitive movements
- changing positions if feeling strain or pain
- not sitting or standing too long where possible
- wearing comfortable footwear as much as possible
- providing suitable and adequate information and training of hazardous manual tasks.

It is recommended that sex workers are appropriately trained before providing hands-on support to clients with disability. Training topics such as manual lifting, falls procedures and catheter use is available through organisations such as [National Disability Services](#). Sex workers can learn more generally about providing services to clients with disability by contacting or attending training delivered by [Touching Base](#).

For further information, see the [Hazardous manual tasks Code of Practice](#).

<sup>10</sup>. Adapted from SafeWork NSW, Health and safety guidelines for sex services premises in NSW, [Health and safety guidelines for sex services premises in NSW](#) | SafeWork NSW, October 2022.

## 6.7 Slips, trips and falls

Workers and clients may be exposed to slip and trip hazards inside and outside a workplace including outcall locations during day and night work hours.

### Common risk factors that contribute to slips, trips and falls

- Poor design and layout of accessways, stairs (including handrails) and ramps.
- Flooring that does not suit the combination of expected work activity, possible contaminants and the characteristics of people using the area (for example, consideration of wet areas such as bathrooms and toilets, expected pedestrians, their activities and their footwear).
- Surface contaminants (anything that ends up on a floor) that increase slipperiness when walking (for example, wet contaminants such as water, lubricant or oil and dry contaminants such as talcum powder).
- Temporary or permanent obstacles or other trip hazards (for example, loose mats, cords/cables across walkways, uneven or broken concrete or tiles).
- Poor lighting that limits visibility of walking paths and potential slip or trip hazards.
- Poor cleaning procedures that do not effectively clean floors or procedures that do not keep pedestrians off floors that aren't fully dry.
- Dancers slipping and falling when poles become slippery due to oil-based skin products, irregular cleaning or using incorrect cleaning products.
- Poor visual contrast of edges of stairs, start/end of ramps or unremovable trip hazards.
- Inadequate storage leading to items stored in walkways and on stairs.
- Poor maintenance and housekeeping which fails to keep walkways clear, tidy and in good order.

### Reducing or preventing injuries from slips, trips and falls

Measures to address the risk of slips and trips are straightforward and simple to put in place.

#### **Designing and planning:**

- Select and correctly install the most appropriate flooring for the expected activities and possible environmental conditions (for example, contamination under wet and dry conditions). Additional floor treatments may be needed to improve grip on flooring.
- Improve the safety of stairs and ramps with consistent design and suitable handrails (for further information, see [Safe design and use of stairs | WorkSafe, qld.gov.au](https://www.worksafe.qld.gov.au)).

#### **Containing contaminants, cleaning, maintenance and housekeeping:**

- Stop and contain surface contaminants (for example, fix a leaking fridge).
- Use the correct cleaning methods for flooring and poles, including spills management and routine cleans (see **Section 3.2**).
- Schedule cleaning for when minimal pedestrian traffic is expected in the area and keep pedestrians off floors that are not yet dry.
- Provide clean up equipment where spills are more likely to occur (for example, extra paper towels and bins).
- Undertake regular housekeeping and keeping flooring, stairs and ramps maintained (see **Section 3.2**).
- Undertake regular cleaning and maintenance of outdoor areas (for example, car parks and paths).

#### **Other measures:**

- Dancers may consider the use of grip enhancers.
- Where sex workers stand on a massage table or on the client, a sturdy safety rail should be fitted to the wall or ceiling to provide support for the sex worker.
- Ensure all poles and aerial rigging in venues have been professionally installed.
- Provide and allocate adequate storage facilities.
- Provide and position sufficient power points close to areas of use.
- Provide and maintain adequate lighting to clearly see walking surface and potential slip or trip hazards, including for day and night movement.
- Sex workers should change from high heels to comfortable shoes when going up or down stairs or carrying laundry, linen or other items when possible.
- Use and maintain slip-resistant mats in wet areas.
- Undertake regular inspections and implement processes to support early reporting.

Further information is available in the [Guide to preventing slips, trips and falls at work](#).

# 7. WHSQ resources

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## Codes of Practice



Codes of Practice that are relevant to sex work include, but are not limited to:

- [First aid in the workplace Code of Practice](#)
- [Hazardous manual tasks Code of Practice](#)
- [How to manage work health and safety risks Code of Practice](#)
- [Managing the risks of falls at workplaces Code of Practice](#)
- [Managing risks of hazardous chemicals in the workplace Code of Practice](#)
- [Managing the risks of psychosocial hazards at work Code of Practice](#)
- [Managing the work environment and facilities Code of Practice](#)
- [Manual tasks involving the handling of people code of Practice](#)
- [Work health and safety consultation, co-operation and co-ordination Code of Practice](#)

For more information and a complete list of Queensland's Codes of Practice, see [www.WorkSafe.qld.gov.au/laws-and-compliance/codes-of-practice](http://www.WorkSafe.qld.gov.au/laws-and-compliance/codes-of-practice)

## Guidance material



Guidance material that may be relevant to sex work includes, but is not limited to:

- [A guide to working safely in people's homes](#)
- [Bullying](#)
- [Guide to preventing slips, trips and falls at work](#)
- [Hazardous manual tasks](#)
- [Housekeeping](#)
- [Latex allergy](#)
- [Preventing and managing fatigue related risk in the workplace](#)
- [Remote and isolated work](#)
- [Violence and aggression](#)

For more guidance, see [www.WorkSafe.qld.gov.au](http://www.WorkSafe.qld.gov.au)

## Other WHSQ resources



Other WHSQ resources include, but are not limited to:

- [Confirm if an incident is notifiable](#)
- [Hazard Identification checklist](#)
- [Mentally healthy workplaces toolkit](#)
- [Notify us of an incident](#)
- [Notify Workplace Health and Safety Queensland or the Electrical Safety Office](#)
- [Risk assessment template](#)
- [Risk management plan](#)
- [Worker consultation checklist](#)

For more guidance, see [www.WorkSafe.qld.gov.au](http://www.WorkSafe.qld.gov.au)

# 8. Other contacts and resources

Australian Taxation Office (ATO)	ATO guidance on employees and independent contractors and how it affects taxation, superannuation and other obligations.	<a href="https://ato.gov.au/businesses-and-organisations/hiring-and-paying-your-workers/employee-or-independent-contractor">ato.gov.au/businesses-and-organisations/hiring-and-paying-your-workers/employee-or-independent-contractor</a>
Fair Work Commission	Deals with disputes about workplace bullying and sexual harassment for most private sector employees.	<a href="https://fwc.gov.au/about-us/contact-us/queensland-office">fwc.gov.au/about-us/contact-us/queensland-office</a>
Fair Work Ombudsman	Assists employers and employees to understand their workplace rights and responsibilities.	<a href="https://fairwork.gov.au">fairwork.gov.au</a>
Fair Work Ombudsman	Information for independent contractors.	<a href="https://fairwork.gov.au/find-help-for/independent-contractors">fairwork.gov.au/find-help-for/independent-contractors</a>
Queensland Government Health and Wellbeing	Provides links to further information and resources on general health and wellbeing.	<a href="https://qld.gov.au/health">qld.gov.au/health</a>
Queensland Health Sexual Health	Provides information and resources on sexual health.	<a href="https://health.qld.gov.au/public-health/topics/sexual-health">health.qld.gov.au/public-health/topics/sexual-health</a>
Queensland Health Sexual Health Clinics	List of Queensland sexual health and HIV services.	<a href="https://health.qld.gov.au/clinical-practice/guidelines-procedures/sex-health/services/find-service">health.qld.gov.au/clinical-practice/guidelines-procedures/sex-health/services/find-service</a>

Queensland Human Rights Commission	Provides information about Queensland's anti-discrimination and human rights laws, including sexual harassment at work.	<a href="http://qhrc.qld.gov.au">qhrc.qld.gov.au</a>
Respect Inc	Peer-based organisation focused on protecting and promoting the rights, health and wellbeing of Queensland sex workers.	<a href="http://respectqld.org.au">respectqld.org.au</a>
Safe Work Australia	WHS resources for migrant workers.	<a href="http://safeworkaustralia.gov.au/safety-topic/managing-health-and-safety/migrant-workers/resources">safeworkaustralia.gov.au/safety-topic/managing-health-and-safety/migrant-workers/resources</a>
Scarlet Alliance	The national peak body for sex workers and sex worker organisations in Australia.	<a href="http://scarletalliance.org.au">scarletalliance.org.au</a>
Scarlet Alliance Red Book	The Red Book Online contains health and safety information by sex workers, for sex workers.	<a href="http://redbook.scarletalliance.org.au">redbook.scarletalliance.org.au</a>
Touching Base	Facilitates links between people with a disability and sex workers.	<a href="http://touchingbase.org">touchingbase.org</a>
WorkCover Queensland	Provides information on workers' compensation insurance and claims.	<a href="http://WorkSafe.qld.gov.au/about/who-we-are/workcover-queensland">WorkSafe.qld.gov.au/about/who-we-are/workcover-queensland</a>

Learn more at  
[worksafe.qld.gov.au/sexwork](http://worksafe.qld.gov.au/sexwork)