

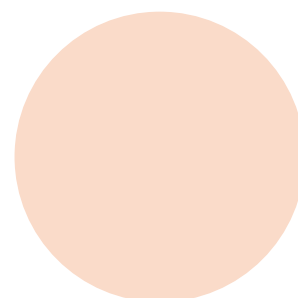
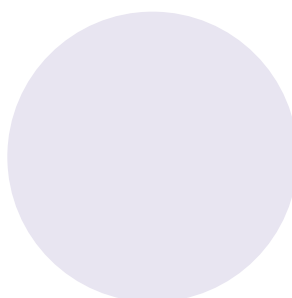


An tÚdarás Sláinte agus Sábháilteachta
Health and Safety Authority

Psychosocial Risk Assessment — Exposure to Sensitive Content

GUIDANCE DOCUMENT

Jointly developed by the Health and Safety Authority
and the State Claims Agency



Contents

1.	Introduction	4
2.	Purpose	6
3.	Scope	6
4.	Consultation	6
5.	Terms and definitions	7
6.	Statutory Requirements	8
7.	Risk assessment	9
	Part a) General Risk Assessment Guidelines	
	Part b) Sensitive Content Risk Assessment	
8.	Conclusion	20
	Appendix 1 Exposure to Sensitive Content Risk Assessment Template	22
	Appendix 2 Supplementary information on psychosocial hazards and intervention supports	24

1. Introduction

This guidance was jointly developed by the Health and Safety Authority (HSA)¹ and the State Claims Agency (SCA)², in order to assist organisations employing people in roles which expose them to sensitive content as part of their assigned duties or other employees who are unexpectedly exposed in their role.

In recent years, health and safety issues in this area of work have been brought to the attention of the inspection function in the HSA as there are a growing number of related jobs located in the Republic of Ireland. The SCA also receives incident reports and claims in the area of exposure to sensitive content across the State sector.

Sensitive content refers to text, pictures, graphs, illustrations, photographs, video clips, or any other type of material of a particularly sensitive nature, for example content relating to child or adult abuse/ pornography or graphic pictures of a violent death. These exposures can significantly impair the psychological health and wellbeing of those exposed, according to relevant research in the psychological literature.

In developing this guidance, the HSA and SCA have drawn on the areas of Occupational Health and Safety Management-psychological health and safety. Additionally, *ISO 45003:2021 - Occupational health and safety management - Psychological health and safety at work - Guidelines for managing psychosocial risks* has been considered.

Psychosocial risks affect psychological health, safety and wellbeing at work. There are a range of terms used in relation to psychosocial risks, their effects and their management. These are listed and broad definitions provided in order to help clarify concepts and meanings. It is important to appreciate that psychological health (mental health) comes within the area of 'health' for the purposes of occupational health duties and the Safety, Health and Welfare at Work Act 2005.

Exposure to graphic content can significantly impair the psychological health and wellbeing of those exposed. Aspects of the broader work environment such as peer and management supports, prescribed accuracy or quantity quotas, lack of control over the systems of work, including lack of forewarning of nature of exposure, can exacerbate the strains or mitigate them. In extreme cases, a form of post-traumatic fallout or burnout can occur. Australia's Victorian Government has included "exposure to traumatic content or events" as one of the major psychosocial hazards in its new psychological health regulations which is currently considering stakeholder feedback and is anticipated to be enacted in 2023³.

The European Agency for Safety and Health at Work (EU-OSHA) has carried out research on content moderators in the context of digital platform work and support this guidance document. A number of OSH risks - especially psychosocial risks - to which these workers are exposed have been identified and analysed, policy recommendations have been formulated, and awareness about them is raised through the Healthy Workplaces Campaign 2023-2025 on Safe and Healthy Work in the Digital Age⁴.

1. The Health and Safety Authority (HSA) has overall responsibility for the administration and enforcement of health and safety at work in Ireland.

2. The NTMA is known as the State Claims Agency (SCA) when managing personal injury and third-party property damage claims against the State and State authorities, as delegated to it, and in providing related risk management services. As the SCA, the NTMA also manages claims for legal costs against the State and State authorities, as delegated to it, however such costs are incurred.

3. Victorian Government Solicitor's Office (2022) new psychological health regulations for Victorian employers are expected to commence this year. <https://www.vgso.vic.gov.au/new-psychological-health-regulations-victorian-employers-are-expected-commence-year>

4. For more information: <https://osha.europa.eu/en/publications-priority-area/digital-labour-platforms> and <https://healthy-workplaces.osha.europa.eu/en>



2. Purpose

The purpose of the guidance document is to provide evidence-based insights for employers, employees and their representatives on good practice and procedures for assessing, addressing and recording psychosocial risks related to exposure to sensitive content in workplaces operating in the Republic of Ireland. Managing these risks appropriately helps manage employee safety while also helping to mitigate future incidents and claims arising.

There is a duty on employers, as per the Safety, Health and Welfare at Work Act 2005, to manage the associated risks in such places of work, with a focus on prevention/reduction of harm in so far as is reasonably practicable. As part of this guide, we reference and highlight the risk assessment framework, Work Positive CI which was developed by the HSA, the SCA and CISM Network Ireland and is available at www.workpositive.ie

3. Scope

This document sets out guidance for organisations employing people in roles which expose them to sensitive content. This includes their employees or persons under their direction and control likely to be exposed to these risks. It also includes contractors who are engaged to review sensitive content on behalf of the organisation on an agreed 'contract for service' arrangement.⁵ Employers should ensure that contractors are in possession of, and adhere to the same standards regarding risk identification, assessment and protective/prevention measures for sensitive content.

The HSA provides leadership in the area of health and safety regulation and advice in accordance with its mandate and is committed to leading best practice in the area. Psychological health and safety

is central to the performance of all organisations and to the success of all businesses and this Guidance is a tool to support this.

The SCA's risk management⁶ mandate has a particular focus on incidents⁷ that may give rise to personal injury claims, including those arising from psychological risks/exposures in the workplace. While there are no occupations which should be regarded as intrinsically dangerous to mental health, the regulatory responsibilities of many State Authorities⁸ means that the roles of many of their employees is to review sensitive content. Employees within these groups who are assessed as at risk of exposure will require access to suitable psychosocial supports designed to combat the negative effects that may arise.

4. Consultation

This Guidance Document has been the subject of consultation using appropriate methods in line with HSA consultation procedures and mandates. Specialist inputs have been kindly given by the following:

- Psychological Society of Ireland (PSI)
 - Division of Work and Organisational Psychology (DWOP)
 - Division of Counselling Psychology
- Critical Incident Stress Management (CISM) Network Ireland
- Selected State Authorities

5. Contract for service - independent contractors employed to undertake a particular job for a fee on behalf of the hiring organisation.

6. The State Claims Agency provides risk management advice and assistance to State Authorities, on whose behalf we manage personal injury and third-party property damage claims. Find out more (<https://stateclaims.ie/services/risk-management/about-risk-management>)

7. Incidents are reported to the SCA using the National Incident Management System (NIMS) . This legal requirement is set out in Section 11 of the National Treasury Management Agency (NTMA) Amendment Act 2000.

8. The State Claims Agency's remit extends across a wide range of bodies involved in the provision of public services, where management of claims is delegated to it, known as State Authorities. State Authorities include the State itself, Government Ministers and Departments, the Defence Forces, An Garda Síochána, the Irish Prison Service, Tusla, other State agencies, community and comprehensive schools, the HSE, and the voluntary health and social care sector.

5. Terms and definitions

Burnout

Burnout refers to a sense of having no energy or commitment for work. It is a debilitating condition and often builds up over time but its effects can manifest suddenly - as the name suggests, it's a state of 'after the fact' energy/enthusiasm eradication. It results from a build-up of challenges which have not been overcome and leaves the person depleted. It is accompanied by feelings of powerlessness, cynicism and fatigue/exhaustion. (HSA)

Chronic stress

Chronic stress - although the initial stress response is normal, if it remains active over a long period as a result of chronic stress, it can drain your physical and mental resources. This can lead to ill-health or extreme and lasting exhaustion (burnout). (HSE, 2012)

Critical incident

The World Health Organisation (WHO, 2006), describes a critical incident as an event out of the range of normal experience - one which is sudden and unexpected, involves the perception of a threat to life and can include elements of physical and emotional loss.

Distress

Psychological distress refers to the negative feelings (such as anxiety, anger, depression, or frustration) that individuals may experience in response to pressures or demands from any quarter. (HSE UK, 2007)

EAP (Employee Assistance Programme)

EAP focuses on the provision of formal counselling and employee assistance programmes in order to assist employees who feel a need for extra support, other than that contained in the human resource function. (HSA, 2009)

Hazard

Anything with the potential to cause injury or ill-health including physical or mental ill-health. Hazard identification is the process of finding, listing, and characterising the hazards that are specific to the work tasks being assessed. (HSA, 2016)

Post-traumatic stress

Post-traumatic stress disorder is a delayed response to an acute stressful and life-threatening event or situation, such as witnessing a violent act. (HSE, 2012)

Primary prevention

This prevention level focuses on stress prevention activities 'at source', in order to prevent it occurring. It usually involves addressing work-related hazards and the sources of harm in their potential state (e.g. changes to organisational culture, workload, job redesign). (HSA, 2012)

Psychosocial hazards

The interactions of: 1) job content, work organisation and management, and other environmental and organisational conditions, and 2) employees' competencies and needs. Whereby the above interactions have a hazardous influence over employees' health through their perceptions and experience. (ILO, 1986)

Risk

The likelihood, great or small, that someone will be harmed by the hazard, together with the severity of harm suffered. Risk also depends on the number of people exposed to the hazard. (HSA, 2006)

Secondary prevention

This level of prevention focuses on prevention activity for employees by minimising the adverse effects of a hazard. It includes training for the job, training in general aspects of health and safety, training in coping strategies and support offered through the provision of adequate management of the social and technical aspects of an employee's working life (i.e. identifying and assisting employees exhibiting the early warning signs of stress and providing supports). This good management practice has a role both in preventing stress and helping stressed employees to recover. (HSA, 2012)

Sensitive content

Text, pictures, graphs, illustrations, photographs, video clips, or any other type of material of a particularly sensitive nature, for example content relating to child or adult abuse/ pornography or graphic pictures of a violent death. These exposures can significantly impair the psychological health and wellbeing of those exposed, according to relevant research in the psychological literature.

Tertiary prevention

Focuses on the provision of staff supports such as counselling, employee assistance programmes (EAPs), occupational health or outsourced support

services in order to assist employees who feel a need for extra support as a result of injury or illness (HSA, 2012). It includes the treatment of the identified condition, rehabilitation and return to work strategies.

Work-related stress (WRS)

WRS is stress caused or made worse by work. It simply refers to when a person perceives the work environment in such a way that his/her reaction involves feelings of an inability to cope. It may be caused by perceived/real pressures/deadlines/threats/anxieties within the working environment. (HSA)

6. Statutory Requirements

Within the Safety, Health and Welfare at Work Act 2005, there are various references, direct and indirect, to the duties on employers to properly and reasonably manage psychosocial hazards.

Section 20 (4) of the Act is pertinent.

It states:

‘Specific tasks’...which “pose a serious risk” to safety, health or welfare require specific risk identification, assessment and protective and preventive measures by employers.

The exposure to and assessment of graphic material poses a specific, known risk and is thus such a specific task.

For companies who outsource such services, Section 20 (3), subsection (6) applies.

It notes that “contracts with another employer where that employer provides services” to another is covered. It also states that it is required “that that employer is in possession of the same standards” regarding risk identification, assessment and protective and prevention measures.

The exposure to and assessment of graphic material poses a specific, known risk thus is governed by this requirement.

Section 8 outlines duties of employers “to manage and conduct work activities to ensure the health and safety of employee.” The health of employees includes mental health, and as exposure to such material can effect mental health, this section is pertinent.

Section 19 outlines the employer duty to carry out hazard identification and risk assessment for all known hazards and is also pertinent as exposure to graphic material is a known hazard.

There are four principal duties on the employer under common law. This includes providing a safe place of work, a safe system of work, providing proper equipment and selecting proper and competent staff.

Therefore employers, and those who control workplaces to any extent, must identify hazards, such as sensitive content, which in the workplaces under their control and assess the risk presented by any hazards. This applies to hazards such as sensitive content which may arise in the work environment.

7. Risk assessment

Part a) General Risk Assessment Guidelines

The Safety, Health and Welfare at Work Act, 2005, places a duty on all employers to ensure the safety, health and welfare at work of their employees.

Risk assessments are the basis for meeting that duty. It is the employer’s duty to have competent individuals, in consultation with employees, carry out, document, record and use these risk assessments. Risk assessments must be carried out on all work activities and consideration given to all people who work within that place of work.

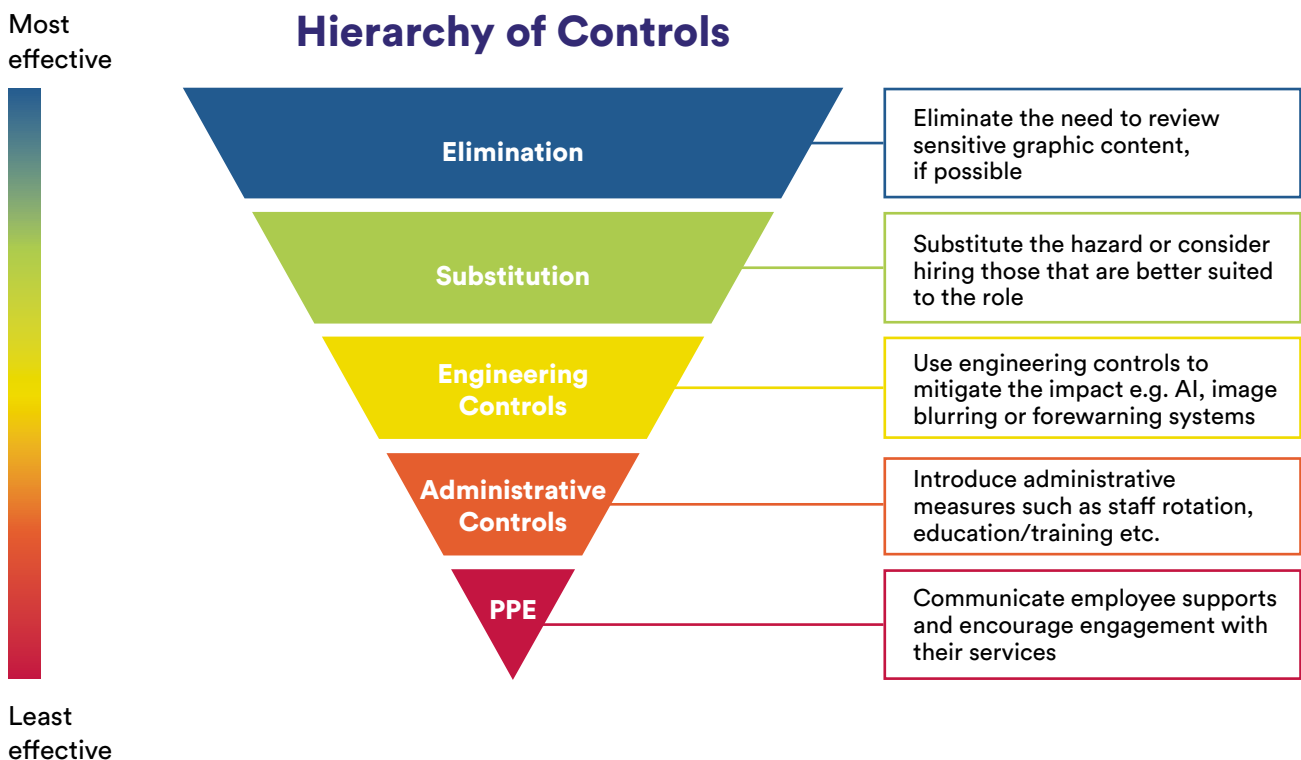
With regard to those reviewing and assessing sensitive content as part of their role, employers are obliged to risk assess. This means assess the level of this known hazard and the risk of it causing harm. For the hazard, there will be various risks and for each risk, the employer must prepare risk assessments, and thereafter consult, design, develop and deliver and use systems to control and prevent the hazard from becoming realised, minimise it or protect employees from its harmful

effects. The records and documented findings and outcomes should be collated in a safety statement. Organisations must:

- assess the likelihood of the hazard/risk occurring by reviewing relevant activity, frequency of events occurring, severity, and the types of roles at risk; and
- provide information and instruction to employees and ensure that they have the necessary supports available to them in their role.

Further information for assessing work-related stress and critical incident stress is available at www.workpositive.ie

Risk assessments follow a structured approach with the use of risk assessment templates. Templates should be appropriate to the tasks and hazards. Use of generic risk assessments could potentially fail to adequately address the risks faced by certain new or unusual work tasks such as is the case with tasks such as assessing sensitive content for review. When implementing controls, the hierarchy of controls should be followed.



The final stage of the risk assessment is to plan how the organisation will monitor and review its implementation (process) and effectiveness (outcome). In line with general risk assessments, progress of the action plan is dynamic in nature and needs to be monitored, to ensure corrective action is identified and addressed, if required, as well as provision made for review and evaluation.

Part b) Sensitive Content Risk Assessment

Exposure to graphic content will affect different people in different ways. Age, experience, gender, attitude and resilience may all interact with exposure to result in different ways of perceiving, reacting to and overcoming challenges associated with exposure. However, it is reasonable to assume that for anyone engaged regularly in such work, there are extra risks over and above those associated with work of an otherwise similar nature but where such exposure is not involved. The effect on individuals of exposure to sensitive content within a work setting is not all easily foreseeable, nor are they all the same for each employee, or all clearly related to a single aspect of the exposure.

The relationships are not linear and there are interactive effects so that exposure to one type of hazard may make exposure to another more difficult. Time of day, day of week and what is going on for the individual outside work, will also make a difference to how they feel and behave. People differ in terms of perception, perspective and coping and resilience levels, too.

Understanding the risks

A key element in understanding traumatic fallout from exposure is to respect the contextual nature of reactions/responses of the reasonable person, and to consider also vulnerable personality types from ongoing exposure to such content. It is anticipated that the experience would be traumatic when it exceeds the emotional resources and capacity of the individual. Accessing therapeutic support when it is needed is an important step, as it shows awareness and recognition that this resource/capacity to cope is being exceeded.

When this strain is not recognised, the risks increase. Risks include:

- Burnout
- Compassion fatigue
- Vicarious traumatisation
- Secondary traumatic stress

Thus, it is important that organisations maintain awareness of the impact the work is having on sensitive content moderators, for the long-term health and safety of employees. When analysing the effects of traumatic experiences, two levels at least must be considered, namely primary and secondary exposure to trauma.

- Primary exposure is when a person directly witnesses actual disturbing events in real life.
- Secondary trauma is seeing it second hand - through another medium such as a reenactment. Secondary trauma is particularly relevant to persons who review sensitive content. Active versus passive engagement should also be noted. Frontline workers who have an active role where they will be required to make a decision based on their review, will likely be effected differently to those with passive, non-active roles.

Regardless of the differences in exposure type, across all industries, where employees are exposed to sudden traumatic events, for instance; social media platforms, journalism, policing, emergency responders, litigation, welfare and protection services; the range and pattern of symptoms have similarities, albeit not predictably, across all employees exposed.

The vulnerability to distress and psychological injury comes from a number of inter-related areas which, when combined, have synergistic effects.

These are:

- the degree of graphicness of material involved,
- the repeated nature of the disturbing content,
- the long-term ongoing level of exposure,
- the quality of, frequency of and fit of the training and development activities,
- the timings and decision accuracy levels demanded,
- the limited ability of the individual to control the exposure quantity/quality,
- the broader climate within which this work is done, and
- the individual personality and coping capacity of the exposed person.

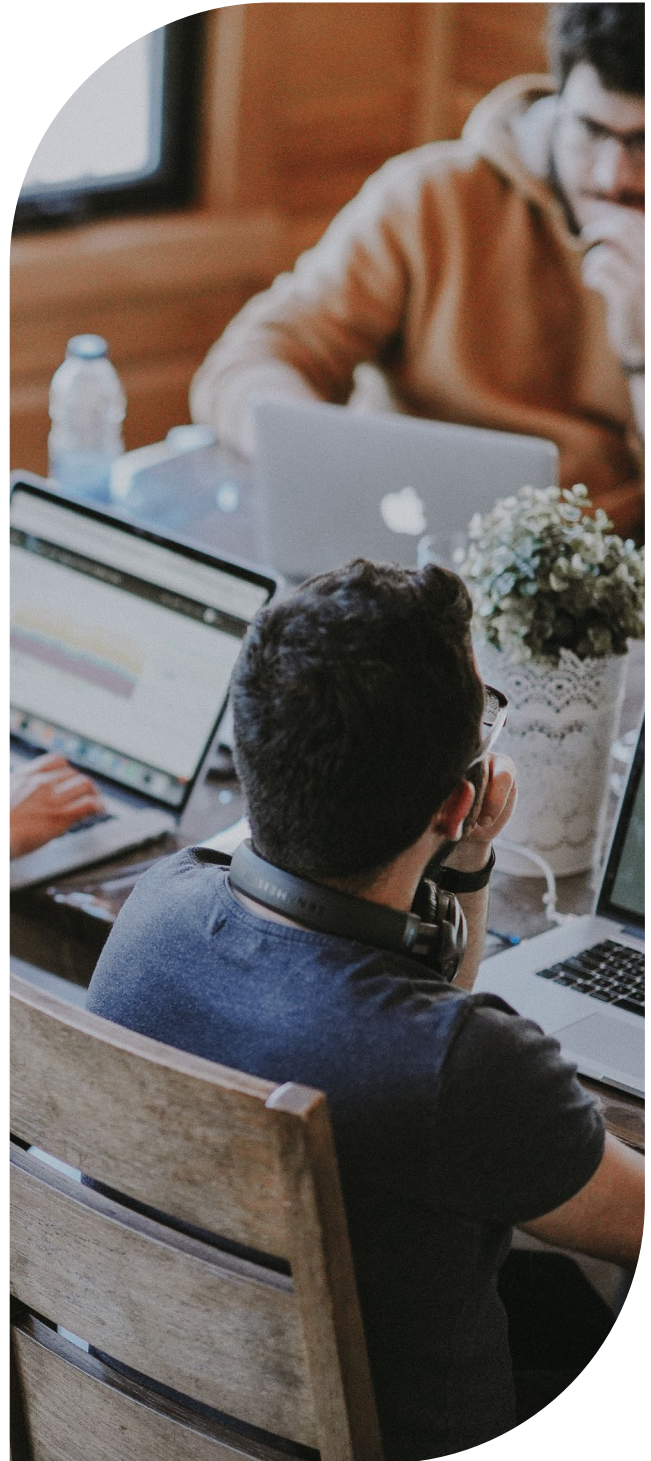
The short-term and long-term effects of hazards differ in this area and the levels of exposure within teams also differ.

Intervention supports and applying the hierarchy of controls

There may be a number of practices/interventions actively in place within your organisation to help mitigate the risks associated with sensitive content review.

These interventions can be applied through the hierarchy of controls in helping to mitigate the risk, as set out in the next section. There are three main types of intervention supports:

- **Primary prevention** in this area aims at preventing harm by preventing exposure - while also increasing tolerance to exposure through careful recruitment of suitable populations, enhancing resilience, and ensuring a supportive general work climate around the activity itself.
- **Secondary interventions** are those which rely on tools and proven evidence-based technique for the particular employee group exposed to the material, over and above more general interventions. These, in this context, are aligned to the design of the work system - through daily work distribution and design, weekly scheduling and limited exposure boundaries and de-briefing, with built-in mandated time-out periods. These should span cognitive, psychoeducational and practical action-based activities to reduce the risk of maladaptive responses to the exposure for those exposed. The COVID-19 pandemic has enabled home-working at an unprecedented scale; however, workers handling disturbing content should have access to a distinct physical space for working (e.g. office), in order to draw boundaries between work and life⁹.
- **Tertiary interventions** focus on after the fact, ongoing safety climate and psychological safety initiatives, such as wellness programmes, EAP and counselling supports, phone lines and other therapeutic workplace interventions, some mandated and others voluntary, but all made available and easily accessible to the exposed individuals. Managers should regularly check in with workers exposed to disturbing content to understand the impact and identify additional support or training needs, which is particularly important if staff are remote working without in-person support.



9. Baker, E. et al. (2020) Safer viewing: A study of secondary trauma mitigation techniques in open source investigations. *Health and Human Rights Journal*, 22(1): 293 - 304.

a) Risk elimination/substitution

Questions to consider:

- Can the hazard be avoided?
- Is it necessary for your organisation to review content of a sensitive nature?
- Can the number of people exposed be minimised?
- How does your recruitment, selection and induction ensure minimal risk?
- What is their age profile and prior workplace experience?
- Has there been prior exposure to the hazard that may aggravate the risk?

If a role will involve reviewing sensitive content, it is unlikely that the hazard can be eliminated or substituted from the work environment. However, the recruitment processes should consider the population that may be exposed and if certain indicators of concern arise it would be prudent not to proceed with hiring.

By their nature, some people will be much more vulnerable to exposure to sensitive content than others. Experience in the world of work and non-work, resilience, personality type, age, gender and other demographic and cultural factors will matter. So, recruitment of the more suitably able and resourceful personnel is the first method of ensuring less risk from the hazard is delivered to less vulnerable individuals.

It is crucial to look at the broader issue related to the recruitment and selection (psychological suitability) of those doing this type of work. Whenever possible, the roles should be staffed voluntarily by employees who have a clear understanding of the nature of the content, the level of exposure, and have been brought through rigorous, pre-exposure de-briefing and preparation. The Technology Coalition¹⁰ has recommended the creation of and adherence to 'hiring process transparency plans' when recruiting roles for handling disturbing images¹¹.



Psychometric testing, which captures not just cognate functions such as decision making and reasoning, but socio-emotional functions and mental health generally, should be used, as should specifically bespoke assessments looking at previous experiences, both work and non-work, previous traumatic events/exposures, experience in various work settings, previous life experience and exposure and clinical health and robustness criteria. The UK College of Policing (2017) also recommends the use of validated questionnaires to measure personality (extraversion/introversion, neuroticism/emotional stability) and personal resilience in order to identify job candidates' vulnerability to the psychological risks¹².

Furthermore, personal connections should be considered, for example, having a child of a similar age to an abuse victim in the graphic content could increase the risk of secondary trauma. If the organisation has policies or procedures that allow employees working with sensitive content to request alternative work placement, these workers should be informed about such policies upon hiring¹³.

10. The Technology Coalition is an alliance of global tech companies who are working together to combat child sexual exploitation and abuse online.

11. The Technology Coalition (2013) Employee resilience guidebook for handling child sexual abuse images.

12. College of Policing (2017) Psychological risk management. Introduction and guidance.

13. Google – Wellness standards for sensitive content moderation. https://about.google/intl/ALL_us/wellness-policy/

Case study 1 - The importance of proper recruitment and selection

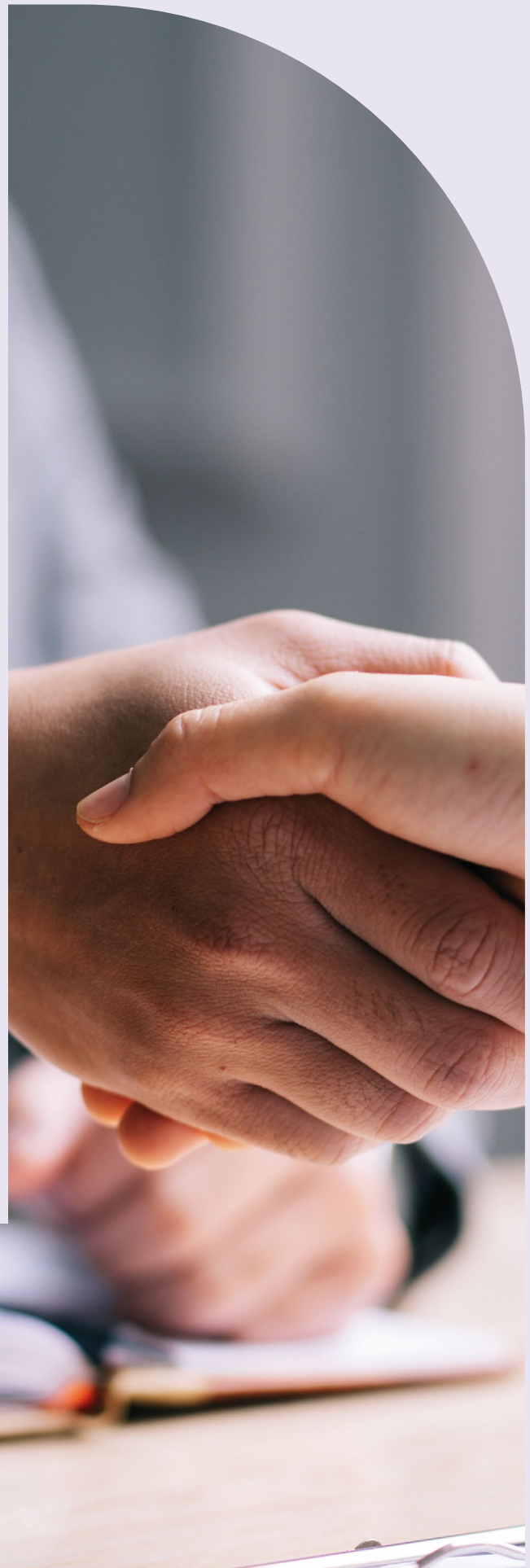
Hannah was hired to work in a role in the public sector that primarily involved her reviewing sensitive case files. After a few months in the job Hannah felt the extent of material she was reviewing was starting to take its toll on her mental health. Her understanding on what the job would involve varied a lot from the type of work she ended up doing and she began to question if she really was cut out for the work.

She said she would stick with the job for a little bit longer but after a few weeks she started to struggle. She now felt that she just wasn't cut out for the job and regretted ever taking on the role. She felt overwhelmed with the graphic nature of the material she was reviewing and she wasn't sleeping well. She became much more distant and her relationships with friends and colleagues were straining. Hannah went to her local GP and was placed on extended sick leave due to work-related stress.

Risk learning

Nobody should ever be recruited into these positions without vetting. Proper recruitment and filtering should take place before selection, in all cases, to ensure mental robustness.

Organisations should ensure that the role descriptions for those that involve the review of sensitive content clearly sets out the nature and extent of the content to be reviewed. This exposure should be clearly set out and discussed at the recruitment stage. Psychometric testing should be used and bespoke assessments looking at previous experiences and exposures to previous traumatic events.



b) Engineering controls

Questions to consider:

- Are forewarning systems in place to grade the content? Once categorised does material need to be looked at?
- Is artificial intelligence or machine learning available or other technical assistance to help reduce exposure to content?

Where elimination and substitution of the risk is not possible, organisations should consider what engineering controls could be applied to help mitigate the risk to an appropriate level.

There is an array of technology now available to organisations and all available options should be explored. Artificial Intelligence (AI) allows for blurring of imagery, forewarning sound or visual cues, queue management arrangements, forced engineered time limits of typology exposure.

At the time of this guidance, state-of-the-art AI technologies (e.g. algorithms/machine learning) are still insufficient to replace human content moderators to detect sensitive content; however,

there are tools available that can offer aids in detecting known images of sensitive content¹⁴. For example, Microsoft and Dartmouth College developed PhotoDNA¹⁵, which has assisted organisations across the world to detect, disrupt and report millions of known images of child exploitation. PhotoDNA is available free of charge to law enforcement agencies as well as certain qualified customers. Another example is the Global Internet Forum to Counter Terrorism (GIFCT), which is a shared database of extremist content created by Facebook, Microsoft, Twitter and YouTube¹⁶. It helps to prevent terrorists and violent extremists from exploiting digital platforms. By 'remembering' the content, these tools allow known sensitive graphic material, when circulated, to be automatically detected without any additional and unnecessary exposure to people. The role of AI will continue to grow in content moderation¹⁷.

14. Steiger, et al. (2021) The psychological well-being of content moderators: the emotional labor of commercial moderation and avenues for improving support. In CHI Conference on Human Factors in Computing Systems (CHI'21), May 8-13, 2021, Yokohama, Japan. ACM, New York, NY, USA, 14 pages. <https://doi.org/10.1145/3411764.3445092>

15. Microsoft PhotoDNA. <https://www.microsoft.com/en-us/photodna>

16. GIFCT - Preventing terrorists and violent extremists from exploiting digital platforms. <https://gifct.org/>

17. Forbes (2022) The growing role of AI in content moderation. <https://www.forbes.com/sites/forbestechcouncil/2022/06/14/the-growing-role-of-ai-in-content-moderation/?sh=2c1d9ebe4a17>

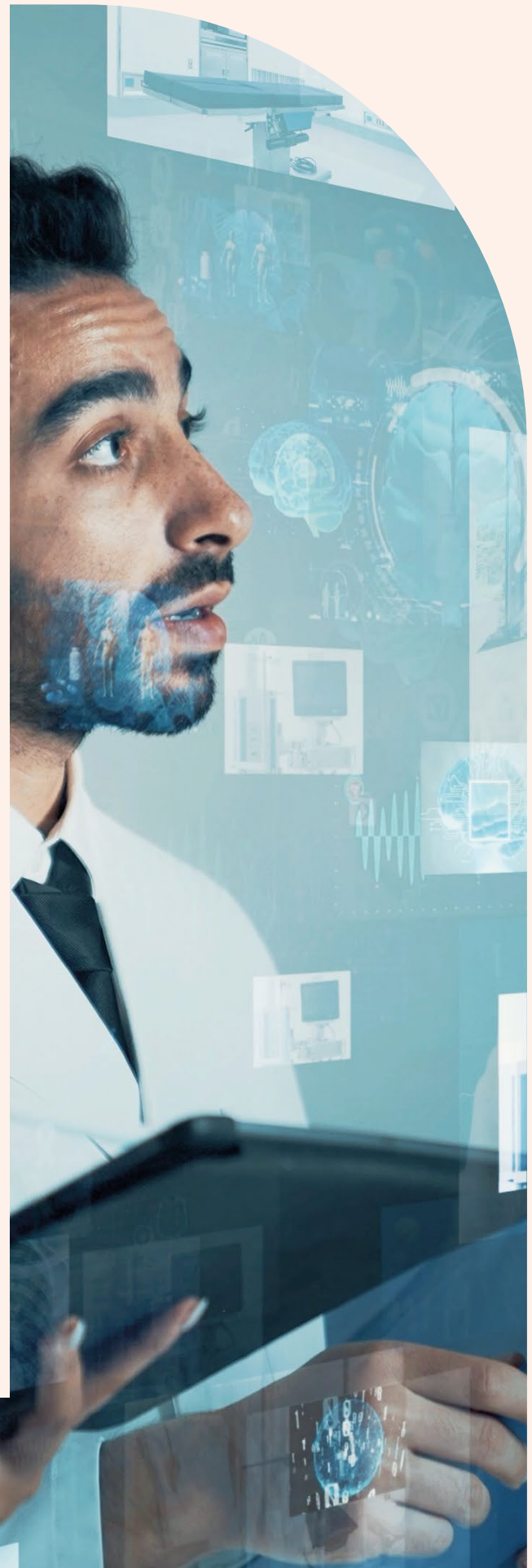
Case study 2 - Artificial intelligence and forewarning systems

Declan was hired for a role that involved him reviewing abstract case files used as part of police evidence and legal cases. While his role was computer desk-based, he was comfortable with the variety of the cases. There were times however when he found the role challenging particularly when the case files were graphic in nature. On some days images would appear on his screen without any warning - he found this really challenging and difficult to look at but he was expected to review the images as part of his work.

Declan was doing well in his job and was promoted to a more senior position. The promotion, however, meant that he would be working on more sensitive files so the volume of graphic material he was reviewing nearly doubled. He really struggled with this. He started to become anxious and was finding it difficult to block the graphic images from his head. He asked his employer if they could blur some of the graphic images or if they could be flagged before he opened them so at least he could be prepared. He was told however that this technology was not something within their budgets. His employer said they might consider it next year if they can get the funding. He continued with the job for a few more months but began to feel unwell and was suffering with work-related stress. He took some time off work and decided not to return to the job.

Risk learning

While AI technology cannot be completely relied on to replace human content moderators, tools which allow for image blurring or forewarning of content can have a significant impact in reducing the impact of exposure and the risk to the reviewer. As technology continues to evolve one can only expect the availability of these tools to come to the forefront of risk management controls and organisations need to keep abreast of these developments and deploy them where appropriate to the role and the risk.



c) Administrative controls

Questions to consider:

- Length and frequency of exposure - how does the system of work limit and control the exposure? Is there rotation of staff including regular breaks from role? (Note 6 hours shift in role shown to be more at risk)
- Timing of exposure - is timing of any potential exposure integrated within the working week/day?
- Team dynamics - is there proper selection and fit within at-risk teams?
- Are education and training programmes delivered through an appropriate medium so all staff understand the key messages?
- Organisational and broader cultural aspects - is there a psychologically safe climate and trust?

There are a number of administrative factors that can be applied within the organisation including examining the length and frequency of exposure, the timing of exposure, any possible team dynamics and the cultural aspects in creating an environment of safety and trust.

Particular consideration needs to be given to new recruits with an induction provided on how the risks are being appropriately mitigated within the organisation. Once that induction is completed, formal recorded feedback should be received from those doing the work, both anonymously and otherwise. This should then feed into the arrangements as part of the consultative element of the risk assessment. There should be mandatory health and safety sessions focused on strategies to lessen the after-effects of exposure, milder materials interspersed with sensitive material and shorter exposure periods for induction.

These should be recorded, and continue until the individual has been properly attuned to the work and culture. This should develop a sense of psychological safety in those recruited properly for such roles. All education and training programmes should be delivered in a manner so that all staff understand the key messages.

Other administrative controls include applying mandated breaks, de-briefings, opportunity for peer and manager supportive discussions, and time limits for exposures.

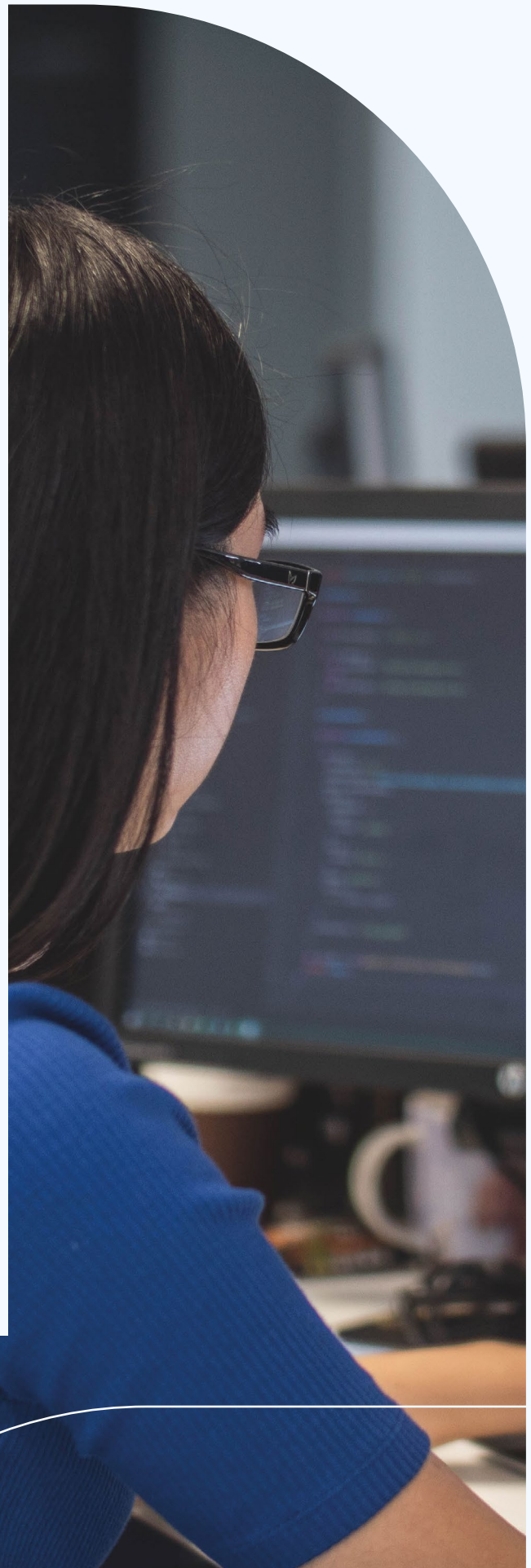
Case study 3 - Placing an emphasis on clear communication

Alfonso works in a content moderation role in a technology company. He got the job through a friend of his, who already worked there and said he would get him in quickly. Due to internal pressures, Alfonso's induction was just a half-day watching corporate videos. He works long shifts and often works weekends, in order to build up some funds so he can purchase a flat instead of sharing with some people he knows from home.

Alfonso had no idea he would be watching such violent and disturbing images and tries hard to switch off after his shifts, but it's not easy. He rarely gets a break from the work and the extent of graphic content he had to review was creating a big burden on him. He cannot talk to anyone about the disturbing thoughts which keep interfering with his life, when he is off duty. His sleep is also disturbed and he has lost interest in doing things outside of work. He is unsure of what to expect every day, and as English is not his first language, he doesn't understand what some colleagues are saying so cannot engage properly with them. Sometimes he gets upset when he is at home and snaps at his flatmates, which he later regrets and is then concerned that they will ask him to leave. He sees no way out at the moment so must keep going.

Risk Learning

Long shifts and extended exposure periods, regardless of commercial pressures, should not be normalised. Organisations should apply mandated breaks and have restricted time limits for exposures. Induction should always involve pre-warning of the content, the level of exposure and the possible effects, in an appropriate medium. Every health and safety and exposure-related message should be made available in a language the employee can understand.



d) Employee supports

Questions to consider:

- Is there in-house bespoke support available (Employee Assistance Programme) and made aware to your employees?
- Is there access to preparatory training (evidence-based strategies on self-care, resilience, and stress management to reduce emotional impact) and awareness of the supports available?
- Peer and management systems - are trained peer supports in place?

Support for staff after a trauma is a crucial element in any risk assessment for those exposed to traumatic events. However, this threat is different to those working in areas where the hazards are ongoing and an essential aspect of the tasks of the role. These threats are not one-off events, thus they should be assessed and treated differently.

The organisation should ensure it has appropriate supports in place to address proactive and reactive needs. At a minimum your organisation should have an Employee Assistance Programme (EAP) available which is tailored to the role. Depending on requirements, you may also require trained peer support staff in place which can be deployed should critical incident exposures arise. To avoid stigma around mental health problems, consideration should be given to make psychological counselling mandatory for 'high exposure' employees¹⁸. Ideally, the counselling services are administered by psychological professionals specialised in secondary trauma intervention.

There is some support, for instance, for early peer support, one component of the proper multimodal approach. Early, frequent, reasonable intervention as part of the system of work, in which controls are embedded, is best practice. Support is key, from both peers and managers and from the leadership and organisational culture.

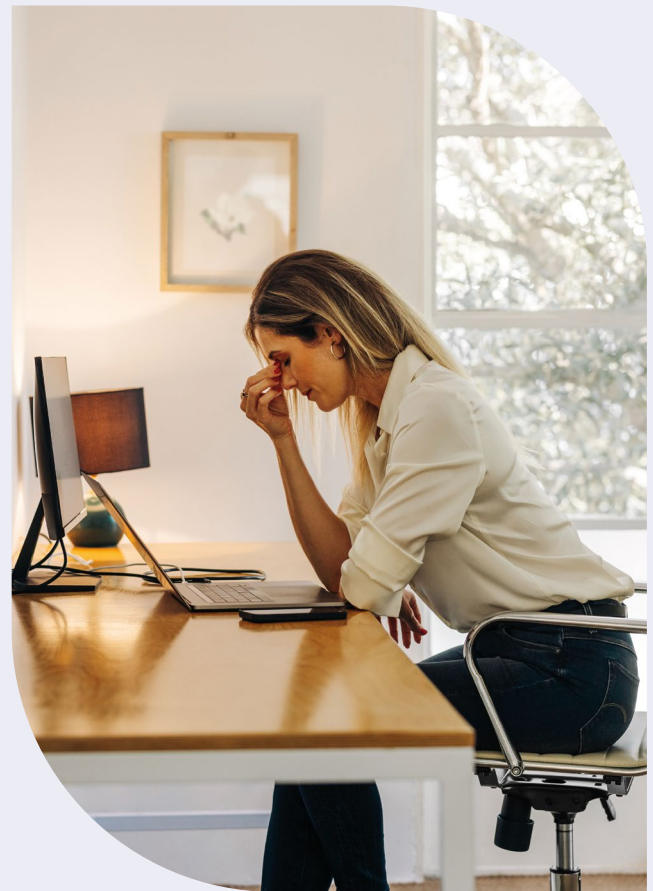
See Appendix 2 for additional information on psychosocial hazards and intervention supports.

18. The Technology Coalition (2013) Employee resilience guidebook for handling child sexual abuse images.

Case study 4 - The benefits of employee supports

Yvonne works as a solicitor in the private sector. Her role involves reviewing sensitive information when preparing Freedom of Information requests. Yvonne was exposed to a number of cases that included details of sexual abuse and arising from this she experienced feelings of anxiety and work-related stress. She didn't notice anything for some time but friends and family started telling her she was different, withdrawn and at times, doing things which seemed self-destructive to them - drinking more than usual, alienating herself, and having angry outbursts.

Yvonne knew that her work was challenging but hadn't thought of it any further. However, she decided to mention her concerns to a colleague, and then, with support, to her manager. She was advised to go to the in-house free counselling service and to take a few weeks break from the more challenging content. She availed of this and found it helpful to find a way to build boundaries between her exposure to disturbing content and other, easier work. She developed some coping strategies and asked for changes in her work routine - to build in more control for her over when, how and at what pace her work would involve sensitive content. Her manager facilitated these changes. The support was helpful and weekly sessions for all staff were instigated to help debrief those working in the area.



Risk Learning

It's important that employees are advised in advance of possible personal mental wellbeing fallout from these roles, so that they are better able to recognise it in themselves.

It's best to tackle it early. It's important to talk - when Yvonne started feeling distressed, she was able to talk to friends, family and/or colleagues about her wellbeing concerns. It's important to act - Yvonne was able to approach her manager for support and the manager was able to take action to alter the system of work, at the time, appropriately. Yvonne's employer should ensure that all the employees are aware of the supports available to them. It's often necessary to temporarily alter the exposure level in times of particular crisis and then to review the system in an ongoing way, as far as is reasonably practicable.

8. Conclusion

The HSA and SCA jointly developed this guidance with the purpose of providing evidence-based insights for employers, employees and their representatives on good practice and procedures for assessing, addressing and recording psychosocial risks related to exposure to sensitive content in workplaces operating in the Republic of Ireland.

The guidance document sets out practical risk management guidance to help support organisations in the management of this risk which can help promote employee safety and health while also helping to mitigate incidents and claims arising in the future.



Appendix 1 - Exposure to Sensitive Content Risk Assessment Template

Note - The hazards and risks listed above are not all encompassing and are provided as an example only. If the risk is rated as "high" additional controls will be required, please see table below:

Hazard	Is the hazard present? Y/N	What is the risk?	Risk rating H = High M = Medium L = Low	Control measures (When all controls are in place risk will be reduced)	Is the control in place? Y/N	Action/ to do list/ outstanding controls	Person responsible	Date action completed
Exposure to graphic/sensitive content	Y	Emotional distress from viewing content	H	Engineering controls - use of grey scaling, blurred imaging, screen time out, forewarning system to grade content. Weekly supervision sessions			HR Manager/ IT Manager/ Direct Line Manager	
Unexpected exposure to sensitive material/content		Increased anger/emotional upset for those effected	H	Appropriate recruitment process that considers age, previous experience, prior exposures, mental health screening. Employee induction outlining the role, responsibilities, available supports and mental resilience requirements of role				
		Fatigue	H	Supports are available to staff who indicate bona fide issues with stressors from the work environment which cannot be altered or reduced at source				
		Effects on mental health, (e.g. anxiety, depression, insomnia)	M	Ensure break times are adhered to. Screen breaks are taken regularly throughout the shift. Staff rotation, Regular check-in with employee - Weekly supervision				
			L	Adequate training and ongoing CPD in resilience building and regular reviews				
			M	If necessary, staff are given training to support any changes in their jobs				
			L	The company monitors employee sickness absence and identifies reasons for absence				
			L	Staff can/should be able to approach their manager or HR to access appropriate support, e.g. Employee Assistance or other occupational health service, post incident support that is specific to their role				



Appendix 2

Supplementary information on psychosocial hazards and intervention supports

What is a psychosocial hazard?

Psychosocial risk encompasses how people behave and how they are managed, how roles are defined and explored, how work is done, shared, organised and supported and how change is managed and communicated. All of these elements are part of the organisational climate, feeding into the overall culture.

These organisational systems gather momentum over time and establish patterns which further influence how people feel and behave. There are many consequences of badly managed psychosocial hazards at work but a frequent one is work-related stress, including, for certain items, critical incident stress.

Rather than outlining the many possible examples of such hazards, it is more useful to categorise them under certain pre-defined classifications. This allows us to better understand where they are sourced within the work system. Most research into work-related stress (WRS) relies on psychological models which have investigated the origins of stress, both within work and outside it. Research into WRS tends to converge on the main models relied on here. These suggest that WRS comes from a mixture of Demands, Control and Support systems, that it is also influenced by relationships, role and change: the standard of relationships - or the ways people relate at work - individual roles, and the communications around change at work.

‘Hazards of a psychosocial nature include aspects of work organisation, social factors at work, work environment, equipment and hazardous tasks’ ISO 45003 standard (2021)’.

What is Work-Related Stress?

Work-related Stress (WRS) is stress for which work is a causal factor. While stress itself is not an illness, it is an emotional state which leads to cognitive, behavioural and social diminishment.

Pressure itself is not stress, but it can, if excessive, lead to stress. A person under so much pressure that they feel stressed feels and behaves differently. A stressed person is less capable of operating at peak, more prone to emotional distress and less competent at self-management and insight.

Stress is a state where a person feels unable to cope with the demands placed on them. It can be short term, such that the individual gains mastery over the challenge and becomes empowered and feels able for the demands and it passes. Or, it can be longer term, known as chronic stress, where the individual becomes increasingly diminished, more upset, and less capable of self-management and there is an accumulation of symptoms and consequences. This is the area of stress which we refer to in terms of work-related stress issues.

What is Critical Incident Stress?

The World Health Organisation Rephrase - (WHO, 2006) describe a critical incident as an event out of the range of normal experience - one which is sudden and unexpected, involves the perception of a threat to life and can include elements of physical and emotional loss.

Often such events are sufficiently disturbing to overwhelm, or threaten to overwhelm, a person’s coping capacity. Most people would be severely shaken by a critical incident but are likely to recover from its impact with appropriate support. The majority of occupational groups exposed to critical incidents may experience stress that does not lead to a diagnosable mental health disorder, but rather to a variety of symptoms of varying severity, which are likely to recede over the weeks and months after the critical incident, particularly if they receive appropriate and timely support. These include: emotional reactions - shock, anger, guilt, helplessness; cognitive reactions - disorientation, lack of concentration, memory loss; physical reactions - tension, fatigue, pain; and psychosocial reactions - avoidance of socialising, isolation, and distrust. (Rhoads et al., 2008)

Models of WRS

A model is a construct, borne out of research, which tries to explain how something happens.

Some models of WRS suggest that people's perception of the fairness of work systems, their ability to see a balance in the effort they expend and the reward they get and the degree of trust they have in leadership and management systems, play a pivotal role in the development of stress. These various factors feed into the climate at work, the sense of psychological safety, employee's experience, their self-efficacy and their ultimate ability to meet challenges they face at work.

Other models look to the task and job variety at work, the degree to which employees are engaged in decision-making and the degree of job autonomy they enjoy. These models suggest that the need for challenge and stimulation has to be weighed against the counter threat of too much demand and pressure on the individual.

No model can be said to be exactly right for everyone as there is a situational and individual component to the experience of stress; it is not an exact science. All models of WRS look to identify aspects of the work environment (the systems of work) which are more likely to lead to stress for the average employee. However, they all recognise the importance also of the individual and his or her ability level, attitude, self-awareness, history of coping with challenge and perception of the environment.

The Job Demands-Resource Model¹⁸

One very well established effort to consider how aspects of a work environment and job can contribute to WRS and employee wellbeing is the Job Demands-Resources Model. This model suggests that employee wellbeing and burnout can be predicted by understanding the range of demands and resources available to an employee. Job demands describe aspects of a job that require sustained physical or mental effort and are associated with physiological and/or psychological costs.

Demands can be categorised according to whether they are challenge demands or hindrance demands and although challenge demands enact a cost for employees, they are also associated with personal growth, learning or future gain. In contrast, hindrance demands typically thwart growth or create constraints or barriers that make performing the job and maintaining wellbeing difficult and are far more likely to be health impairing. Evaluating exposure to sensitive graphic content from this perspective suggest that it is likely to be experienced as a hindrance demand with the potential for significant negative consequences.

Inherent in the JDR model is the need to offset demands or minimise their potential for negative impact on wellbeing and health. First, the health-impairing impact of job demands can be buffered by job resources.

Job resources are aspects of the job that help employees achieve their goals, reduce job demands themselves or the health-impairing costs associated with them, or stimulate personal growth. Resources include a diverse range of factors and can be categorised according to whether they are social resources (e.g. supervisor or co-worker support), job resources (e.g. task variety, autonomy, opportunities for skill utilisation), organisational (perceptions of fairness, justice and trust in top management), personal (e.g. self-efficacy resilience, gratitude), or developmental (e.g. feedback, opportunities for career advancement).

One way organisations can help to support employees who face hindrance demands as a regular and essential part of their role would be to focus on the provision of job resources that help to reduce the impact of those demands.

The second approach that the JDR Model suggests for protecting employees against the health-impairing costs of job demands is to provide opportunities for employees to engage in a process known as job crafting.

18. Lesener, T., Gusy, B., & Wolter, C. (2019). The job demands-resources model: A meta-analytic review of longitudinal studies. *Work & Stress*, 33(1), 76-103.

Van den Broeck, A., De Cuyper, N., De Witte, H., & Vansteenkiste, M. (2010). Not all job demands are equal: Differentiating job hindrances and job challenges in the Job Demands-Resources model. *European journal of work and organizational psychology*, 19(6), 735-759.

Mazzetti, G., Robledo, E., Vignoli, M., Topa, G., Guglielmi, D., & Schaufeli, W. B. (2021). Work engagement: A meta-analysis using the job demands-resources model. *Psychological Reports*, 00332941211051988.

Lichtenthaler, P. W., & Fischbach, A. (2019). A meta-analysis on promotion-and prevention-focused job crafting. *European Journal of Work and Organizational Psychology*, 28(1), 30-50.

Zhang, F., & Parker, S. K. (2019). Reorienting job crafting research: A hierarchical structure of job crafting concepts and integrative review. *Journal of organizational behavior*, 40(2), 126-146.

Job crafting is a bottom up, employee-driven process of changing jobs to better align with an employee's abilities, needs and preferences. Empowering employees to job craft effectively is a powerful mechanism that can complement more top-down organisational efforts to design roles that are conducive to employee physical and psychological wellbeing. Job crafting efforts can be focused on preventing negative influences such as reducing hindrance demands, or they can be focused on increasing access to positive influences on wellbeing such as increasing job resources and challenge demands.

Evidence suggests that this second form of job crafting is most likely to have a positive impact on employee wellbeing. Examples of this approach to job crafting include proactive behaviours such as seeking feedback and social support, actively working to create meaningfulness by making links between work tasks and broader impact for organisation or society, creating opportunities to network and spend time with colleagues, proactive skill development.

Leadership development that prepares managers to empower employees to engage in these types of job crafting within the constraints of their roles is likely to be worthwhile in reducing the potential for exposure to sensitive material to have health impairing impacts.

Primary, Secondary and Tertiary Interventions

Clinicians commonly identify shock, numbness, disorientation and difficulty focusing as a direct impact of immediate trauma. Other reactions are common in the days, weeks and possibly months after a traumatic event and may manifest in therapy as:

- Fear and anxiety
- Anger and irritability
- Guilt
- Avoidance
- Emotional numbness
- Dissociation

Ongoing exposure to disturbing events has a cumulative transformative psychological effect.

Our worldview can be negatively influenced by our experiences. Routine exposure brings the subsequent risk that this will have an impact on how we see the world. From this perspective, vicarious trauma can be viewed as an occupational hazard whereby the graphic content that a moderator is being exposed to may negatively affect their worldview over time.

Such vicarious trauma can be managed through supports like peer support, low impact debriefing, supervision, and other measures across the personal/social/professional spectrums. Individual therapy can also be an integral piece if the emotional resources and capacity to cope threshold has been exceeded.

Below is a list of possible signs and symptoms to be aware of:

- Sleep disturbances
- Nightmares
- Appetite changes
- Hyper-vigilance
- Exaggerated startle response, "jumpiness"
- Losing things
- Clumsiness
- Self-harm behaviours
- Negative coping - smoking, drinking, acting out

Physical symptoms

- Panic symptoms - sweating, rapid heartbeat, difficulty breathing, dizziness
- Aches and pains
- Weakened immune system

Cognitive symptoms

- Minimisation of your vicarious trauma
- Lowered self-esteem and increased self-doubt
- Trouble concentrating
- Confusion/disorientation
- Perfectionism
- Racing thoughts
- Loss of interest in previously enjoyed activities
- Repetitive images of the trauma
- Lack of meaning in life
- Thoughts of harming yourself or others

Emotional symptoms

- Helplessness and powerlessness
- Survivor guilt
- Numbness
- Oversensitivity
- Emotional unpredictability
- Fear
- Anxiety
- Sadness and/or depression

Social symptoms

- Withdrawal and isolation
- Loneliness
- Irritability and intolerance
- Distrust
- Projection of blame and rage
- Decreased interest in intimacy
- Change in parenting style (e.g., becoming overprotective)

How each employee takes care of themselves can mean the difference between sustainable work and burnout. Because the nature of graphic content moderatorship is one which contains ongoing routine exposure to potentially traumatic content, rather than a single isolated incident, there needs to be a continual application of both pre-exposure and post-exposure intervention that together make up the entire support structure for the role.

Further information and resources

www.hsa.ie

www.stateclaims.ie

www.cismnetworkireland.ie

www.workpositive.ie





An tÚdarás Sláinte agus Sábháilteachta
Health and Safety Authority

Our Vision:

Healthy, safe and productive lives and enterprises

Health and Safety Authority
Tel: 0818 289 389

www.hsa.ie

ISBN: 978-1-84496-295-2

HSA0520