

**Subcommittee on  
Occupational Safety and Health  
(Display Screen Equipment) Regulation**

**Administration's Response to  
Issues Raised by Members at the Meeting on  
14 June 2001**

**To provide a revised Regulation and Health Guide taking into account members' suggestions/concerns**

To clarify the obligations of users of display screen equipment, we have revised section 9 of the proposed Regulation as,

**“9. Users to co-operate with responsible person**

A user shall conform to any system of work and any work practices, and comply with any risk reduction measures, that the person responsible for the workplace at which the user is employed has ~~provided or~~ established or taken for the safety and health of users at workstations in the workplace.”

Proposed textual amendments raised by Members have been incorporated into the Health Guide. As explained in previous Subcommittee meetings, the Health Guide would serve to provide guidance to responsible persons and employees by elaborating on the requirements under the proposed Regulation. It will not carry legal effect. Along this direction, Labour Department will from time to time review the Health Guide and revise it as necessary, taking into account the comments of the public, with a view to giving clear guidance on the proposed Regulation.

**To elaborate on the Administration's response on the amendments proposed by Hon Lee Cheuk-yan, especially the legal aspects.**

Hon Lee Cheuk-yan proposed to add a provision (section 11) in the proposed Regulation. The proposed section 11(1) reads,

“The Commissioner [for Labour] is required to issue codes of practice for

the purpose of providing practical guidance to employers and employees, and to the persons responsible for workplaces who are not employers.”

Members will be aware of section 40 of the Occupational Safety and Health Ordinance, which provides that,

“The Commissioner [for Labour] may issue codes of practice for the purpose of providing practical guidance to employers and employees, and to occupiers of workplaces who are not employers.”

The Administration is of the view that the new section proposed by Hon Lee is inconsistent with section 40 of the Ordinance. This is because section 40 of the Ordinance seeks to confer a power on the Commissioner for Labour to issue codes of practice. The Commissioner has discretion whether or not to issue a code of practice. The new section proposed by Hon Lee would however impose an obligation on the Commissioner to issue a code of practice, thereby disabling the Commissioner from exercising her discretionary power under section 40 of the Ordinance.

Under section 28(1)(b) of the Interpretation and General Clauses Ordinance, no subsidiary legislation shall be inconsistent with the provisions of any Ordinance. It would be ultra vires the Occupational Safety and Health Ordinance to make the provision proposed by Hon Lee.

From a practical point of view, the Occupational Safety and Health Ordinance covers almost all workplaces, both in the industrial and non-industrial sector. It is impractical to issue codes of practice for all workplaces covered under the proposed Regulation because, given the variety of usage of display screen equipment in different trade, it would be very difficult to seek mutual agreements of all the relevant trades on the same set of code of practice. This has been explained in the Administration’s response to issues raised at the Subcommittee on 29 May 2001.

# DRAFT

## **A Health Guide on Working with Display Screen Equipment**

### **Preface**

This booklet is intended to help employers and employees minimize health risks associated with prolonged work with display screen equipment in the office environment.

Part I explains the meaning of ‘display screen equipment’ (DSE), ‘workstation’ and ‘user’ in the context of the Occupational Safety and Health (Display Screen Equipment) Regulation. It also discusses various health issues related to prolonged work with DSE. Part II discusses the importance of risk assessment of workstations and provides easy-to-follow steps for conducting such an assessment. Part III gives practical guidance on the ergonomic requirements of workstations and measures for preventing common ill-health problems.

Occupational Safety and Health Branch  
Labour Department  
November 2000

(3<sup>rd</sup> revision - June 2001)

## **Part I**

### **What is Display Screen Equipment (DSE) ?**

1.1 Under the Occupational Safety and Health (Display Screen Equipment) Regulation (the Regulation), 'display screen equipment' means any display screen which shows letters, numbers, characters or graphics, regardless of the display process involved. It covers conventional display screens, whether based on cathode ray tube displays, flat panels or any other display technology, e.g. ordinary computer displays and microfilm viewers.

1.2 However, the following DSE applications that would pose minimal health risks are excluded from regulatory control :

- a) DSE that is used mainly to show pictures, television or films;
- b) drivers' cabs or control cabs for vehicles or machinery;
- c) DSE on board a means of public transport;
- d) portable systems not in prolonged use;
- e) calculators, cash registers or any equipment having a small data or measurement display required for direct use of the equipment;  
or
- f) window typewriters.

### **What is a workstation?**

1.3 Under the Regulation, 'workstation' means an assembly comprising the DSE, any chair, desk, work surface, printer, document holder or other item peripheral to the DSE, and the immediate working environment around the DSE, e.g. lighting and noise.

### **Who and how are employees affected by the use of DSE ?**

1.4 Employees using DSE only occasionally are unlikely to suffer significant health problems arising from the use of such equipment. However, some employees are normally using DSE as a significant part of their normal work ('user' under the Regulation). These users are usually highly dependent on the use of DSE to do their jobs, and normally use the equipment for continuous spells of an hour or more at a time and more or less daily. Significant training and/or particular skills may be required in

performing the DSE work. Moreover, rapid transfer of information between the user and screen as well as high levels of attention and concentration may be important requirements of the job. Examples of users are word processing operators, data input operators, telecommunication operators, computer graphic designers, financial dealers, etc. As a result of prolonged DSE work, they could suffer discomfort and other short-term health problems like upper limb pains and discomfort, eyestrain, fatigue and stress. Whilst many of these problems are temporary and may go away after work, they can and should be avoided. If the temporary ailments are ignored, such symptoms can deteriorate into chronic health problems requiring long-term treatment which is expensive to both employers and employees, and ultimately to the health care service at large. Further information on DSE-related health issues is at Appendix A.

## **Part II**

### **As a person responsible for a workplace, how can I ensure that DSE users are not at risk ?**

2.1 To ensure that the health of DSE users is adequately protected, a person responsible for a workplace should perform a risk assessment of a workstation in the workplace before it is first used by the users. The assessment serves to identify the potential hazards and evaluate their risks so that appropriate measures can be taken to safeguard the health of the users.

2.2 In the assessment, the responsible person should identify the potential hazards arising from the workstation, which may be related to the DSE, the peripheral items, the furniture, or the immediate working environment around the DSE. He should also decide who may be at risk and how the person is affected, evaluate the risks arising from the potential hazards and decide whether existing precautions are adequate. He could then draw conclusions from the assessment to help identify and plan any improvement measures that may be required.

2.3 A sample computer workstation assessment checklist is at Appendix B. It helps responsible persons conduct the risk assessment for common computer tasks in the office. Responsible persons may use this checklist to assess the workstations in which DSE users normally use. Based on the results, the responsible person can formulate and implement follow-up actions, if necessary, to reduce the risks. Please note that the sample checklist may not cover every work condition. Responsible persons may need to add more questions or modify them according to the characteristics of their work situations. In complex cases, responsible persons may have to seek expert advice.

2.4 The responsible person should review the risk assessment performed in respect of a workstation whenever there has been a significant change in the workstation or in the conditions of the previous assessment, for example:

- a) workstation furniture;
- b) hardware devices particularly the screen, keyboard or other input devices; and
- c) working environment.

2.5 After completing a risk assessment of a workstation, the responsible person should record the findings. If the risk assessment has been reviewed, he should revise the record accordingly. He should also keep and retain that record for a period of at least 2 years after the workstation ceases to be used by any user.

2.6 The responsible person should produce the risk assessment records for inspection by an occupational safety officer upon request. He should, within the specified period, deliver a copy of those records to the occupational safety officer upon the latter's request in writing.

## Part III

### How to control the risks ?

3.1 Under the Regulation, the person responsible for a workplace is required to reduce any risks identified in a risk assessment of a workstation to the lowest extent as is reasonably practicable. For the information of the users concerned, he should inform them the findings of the risk assessment and the actions he has taken to reduce the risks. He should also, so far as reasonably practicable, ensure that workstations normally used by users in the workplace are suitable with regard to the safety and health of those users. The guidance in the following paragraphs describes the general requirements for setting up such a workstation. The responsible person may need to reduce the risks through modifying the work organization or work practice.

### General Requirements for a Display Screen Equipment Workstation

3.2 A DSE workstation is ~~best~~preferably designed ergonomically such that the safety and health of the user are secured, apart from fulfilling the inherent requirements of the task.\* The main features of such a workstation and some suggested precautionary measures are as follows (please also see the diagram) :

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*\*In general, the requirements are fully applicable to a typical office environment. However, there are special situations where some of these requirements may not be applicable because of the inherent characteristics of the task or some practical considerations, for example :*

- a) when a user needs to rapidly locate and operate emergency controls, a detachable keyboard may not be suitable;*
- b) a user who is on wheelchair normally could not adjust the seat height of the chair;*
- c) when the original document is of poor quality, the scanned image on screen may not be clear.*

*In these special situations, the responsible person may need to make some other arrangements to ensure the safety and health of the worker when the latter performs DSE work.*

## Screen

*The screen should give a clear, sharp and steady image.*

- Replace aging monitors or repair defective ones.
- Clean the screen if necessary.
- When the colour blurs or the image deteriorates, ~~move~~ try to relocate the screen away from any source of strong electromagnetic fields, e.g. high power speakers, or vice versa.
- ~~Choose a LCD monitor to avoid the effects of~~ In avoiding image deterioration caused by external electromagnetic fields, a LCD monitor may be chosen.
- If the software application allows, turn the display to light characters on a dark background to make the flicker less perceptible.
- Users who are susceptible to the flickering effect should look for other screen models which produce a more stable display.

*The characters should be of adequate size, with adequate spacing between the characters and the lines.*

- Use a monitor of adequate screen size.
- Adjust the image size and spacing by software control.
- Adopt a viewing distance where the image can be comfortably read. A distance of 35 - 60cm would be appropriate for text of normal font size.

*The brightness and contrast of the image should be easily adjustable.*

- Choose a screen with brightness and contrast controls.
- Always set the brightness and contrast to a comfortable level.

*The screen should be ~~easily~~ swiveled and tilted, if so adjustable, to suit the needs of the user.*

- ~~Choose a~~ A screen with swivel and tilt adjustment is preferable.
- Adjust the screen to make viewing comfortable.

## Keyboard

*The keyboard should be tiltable and detachable from the display screen so that the user may adopt a comfortable working posture.*

*The surfaces of the keyboard and keytops should be non-reflective. The letters and symbols on the key tops should be clear and easily recognizable.*

*There should be sufficient space in front of the keyboard to provide support for the hands.*

- The table edge should preferably be rounded.
- A wrist support pad may be considered if the user finds it more comfortable.

## Work Surface

*The work surface should be large enough for the screen, keyboard, document and peripheral equipment.*

- If the mouse is used intensively, the work surface or the keyboard shelf, if provided, should be large enough to hold the mouse as well. This allows the mouse to be within easy reach.
- If the work surface is limited, try to reorganize the surface layout. Less frequently used items may be taken away.
- Try to use compact equipment.
- Before new DSE is installed, it is desirable to anticipate the space allocation for the workstations ~~should be anticipated~~.

*The heights of the work surfaces for the screen and keyboard should be set to suit the needs of the user.*

- For optimal screen positioning, place the screen in front of the user. ~~†The first line of screen display should preferably be at or slightly below the eye level. In addition, the screen should be placed in front of the user.—~~
- The screen height may be adjusted simply by placing the monitor on a stable object, e.g. the computer case. Other options like using height adjustable monitor arms can also be considered.

- The keyboard and the mouse should be positioned at a height that allows the user to adopt a natural hand-arm posture, i.e. the upper arms held vertical and the forearms approximately horizontal.
- So far as reasonably practicable, a height adjustable desk should be used to support the keyboard, the mouse or other input devices so that the natural hand-arm posture can be adopted.
- If a desk of fixed height is used and it is too high, an adjustable keyboard shelf can be installed under the desk to keep the keyboard at the right level. Alternatively, one may raise the chair to suit the height of the table and provide a suitable footrest to compensate for the raised seat height.

***There should be adequate legroom below the work surface.***

- Ensure that the workstation has sufficient legroom so that the user may stretch his legs or change posture.
- Clear any obstructing materials beneath the work surface.

***~~If document reading is required, a suitable A document holder, if provided, should be provided. It should be stable and adjustable, and be properly positioned to avoid awkward neck posture and movement.~~***

## **Chair**

***The chair should be adjustable in height to suit the body size of the user.***

- The chair should be so adjusted that the user can sit with thighs in a horizontal position when the lower legs are vertical and the feet are resting firmly on the floor. In general, the seat height should be adjustable in the range of 40 - 50cm from the floor.
- The seat height control should preferably be operable from the normal sitting position, and excessive force or tools should not be required.

***The backrest should be easily adjustable in both height and tilt to provide adequate support to the lower back.***

*The seat pan should be of appropriate hardness and the front edge should be scrolled.*

*Armrests, if provided, should not interfere with keyboard operation.*

*The chair should have a stable base. Smooth castors should be provided at its base to allow easy movement if mobility is required.*

- A five-pronged base is generally recommended to prevent the chair from toppling over.
- The type of castor should suit the properties of the floor surface. Castors with low resistance should not be used on a hard floor surface.

## **Footrest**

*A stable footrest should be made available to the user if the chair is too high for the feet to rest firmly on the floor.*

- The footrest should be stable, should have a non-slip surface and be of sufficient size to allow some freedom of movement. The inclination of the support surface should preferably be adjustable.

## **Illumination**

*General lighting or task lighting should be suitably provided in accordance with the nature of the work and the visual demand on the user.*

- The wall, ceiling and floor surfaces should be of medium reflectance to avoid gloom or glare.
- ☐ When documents are read in conjunction with computer work, it is best to use low lighting for the surrounding and a desk lamp for reading the documents. If task lighting is not provided, the illuminance level of the work area should be 300 - 500 lux.
- ~~If task lighting is not provided, the illuminance level of the work area should be 300 - 500 lux.~~

## Reflections and Glare

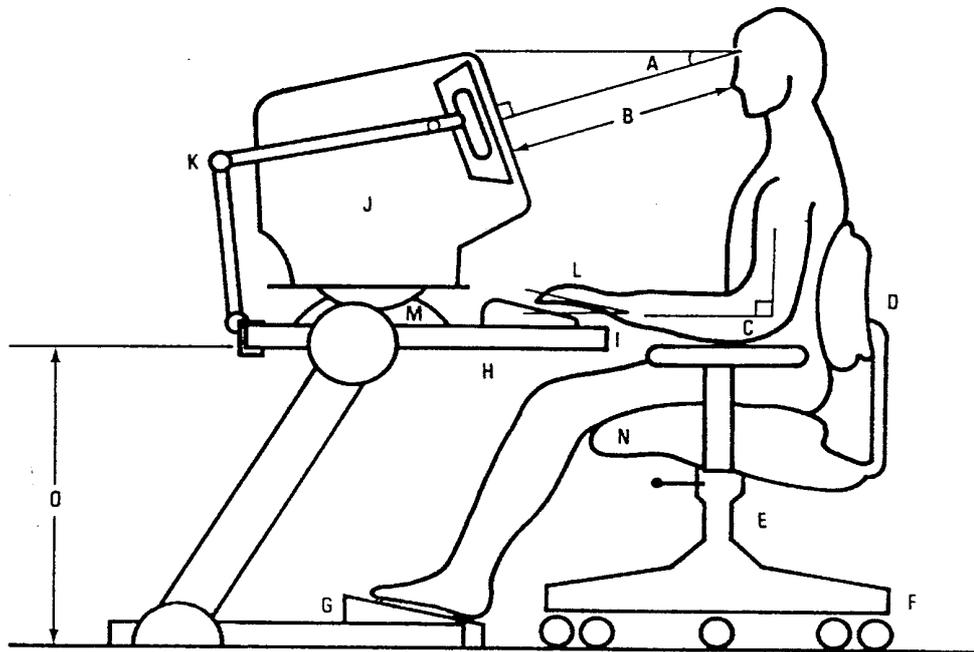
*Reflections and glare should be avoided.*

- Re-position the screen and/or control the light sources appropriately to prevent glare and reflections.
- The finishes of walls and furniture located near the workstation should not be highly reflective. Walls ~~should~~ can be painted in subdued colours.
- The work area should preferably be located away from windows, ~~and~~. ~~The screen should~~ be placed at right angle to windows. Sunlight through windows ~~should~~ can be screened by blinds.
- Light fixtures ~~should~~ can be equipped with diffusers or louvres to control distribution of light.
- Avoid placing the screen under rows of light fittings to eliminate light images.
- Turn the screen display to dark characters on a light background to make reflections less perceptible.
- Using a screen glare filter is another way of reducing screen reflections. In general, screen glare filters reduce the brightness of the image. Therefore the user should ensure that the image's brightness can be adjusted to an acceptable level if a filter is to be added. Nowadays the screens of some monitors are anti-reflective and do not need filters at all. Using a screen filter is not a substitute for proper lighting, but a supplementary solution only.

## Noise

*Noise produced by the workstation or other equipment in the work area should be controlled to avoid disturbance to the user.*

- For general computer work, a noise level below 60dB(A) is ~~optimal~~ recommended.



**Diagram : The optimalrecommended workstation and working posture**

- A First line on screen at about or just below eye level
- B Comfortable viewing distance e.g. 35 - 60 cm for text of normal font size
- C Forearm at about right angle to arm
- D Backrest adjustable in height and tilt
- E Adjustable seat height : allowing the user to sit with thighs approximately horizontal, lower legs vertical and feet resting firmly on the floor
- F Stable base, with castors if necessary
- G Firm footrest if required
- H Adequate leg room
- I Support for hands
- J Screen at about right angle to line of sight
- K Adjustable document holder if required
- L Wrist kept straight or at most slightly inclined
- M Screen support easily adjustable for rotation and tilting
- N Rounded or scrolled edge seat pad
- O Adjustable table height preferable

## **How to reduce the risks by improving work organization or work practice ?**

3.3 Continuous DSE work can be monotonous, while prolonged sitting is tiring. It is advisable that a DSE user performs DSE work and non-DSE work alternatively so that posture can be changed and the fatigue from prolonged DSE work can be relieved. Where non-DSE work cannot be arranged, appropriate rest breaks are recommended, e.g. a 5 - 10 minute break after 1 - 2 hours continuous DSE work depending on the intensity of the work. Moreover, job enrichment can often give an employee more job satisfaction.

3.4 Heavy workloads and tight deadlines can cause work stress, which if not properly managed, may become excessive and affect health. It is advisable that a supervisor effectively plans and organizes the work of his subordinates so that workloads and deadlines are reasonable. In doing so, the supervisor can discuss with the subordinates in setting deadlines and work priorities.

## **As an employer, do I need to provide safety and health training to DSE users?**

3.5 Safety and health training is essential for helping a user avoid risks associated with DSE work. The Regulation requires that an employer provides adequate safety and health training for DSE users employed by him in respect of the use of the workstations normally used by them. **It is recommended that** the training should enable the users to recognize and understand:

- a) the risks of the DSE work;
- b) various precautions for avoiding the risks and their importance, for example, a correct working posture, adjusting the equipment and furniture to suit own body features and work comfort, changes of activities at suitable intervals, etc.;
- c) how to report problems and symptoms; and
- d) how to get assistance from the employer.

3.6 The format of training is not restricted to lectures. Other means like video shows, educational leaflets, seminars can also be considered so long as they are effective in meeting the purpose.

3.7 Whenever the organization of a workstation is substantially

modified, an employer should provide the users concerned with adequate safety and health training in respect of the workstation as modified.

**As a DSE user, how can I co-operate with the person responsible for the workplace?**

3.8 It is a user's responsibility under the Regulation to ~~avoid risks by following a~~ follow the system of work and work practices, ~~and comply with any risk reduction measures,~~ that the person responsible for the workplace at which the user is employed has established or taken for the safety and health of users at workstations in the workplace. A user should co-operate with the responsible person in conducting risk assessments and in the implementation of preventive and remedial measures to reduce identified risks. In case of serious problems relating to the DSE work, a user should immediately notify the responsible person of the matter.

## **Appendix A**

### **Health Aspects of Using Display Screen Equipment**

Prolonged use of display screen equipment may cause short-term health problems like upper limb pains and discomfort, eyestrain, bodily fatigue and stress.

#### **Upper limb pains and discomfort**

The problems of discomfort at hands, arms, shoulders and the neck are common among DSE users. These may range from temporary fatigue or soreness to chronic soft tissue disorders.

Prolonged static posture of the neck, awkward positioning of the hands and wrists, heavy DSE workload combined with tight deadlines are some of the possible causes. These problems are largely preventable by the application of ergonomic principles to the design of workstations and to the organization of work.

#### **Eyestrain**

It refers to complaints of eye fatigue and headache. Causes may include poor visual display quality of the screen, poor lighting conditions and heavy workload. However, it is unlikely that DSE work would cause any permanent effect to the eyes or eyesight.

#### **Fatigue and stress**

Fatigue and stress can be more common among DSE users as the organization of certain types of DSE work may lead to a higher prevalence of common stress-related factors such as lack of sufficient control of the work by the user, high-speed repetitive work and reduced variety of postures.

**Computer Workstation Risk Assessment Checklist**

Department of the organization : \_\_\_\_\_

Workstation number / location : \_\_\_\_\_

Description of computer tasks : \_\_\_\_\_

**Part A : Assessment**

**Display screen equipment and peripherals** Yes      No

- |  |                          |                          |
|--|--------------------------|--------------------------|
| 1. Can the position of the screen, and the brightness and contrast of the image be adjusted easily to suit the working situation ?                                     | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. <del>Is the keyboard tiltable and detachable</del> <u>Can the input devices (e.g. keyboard and mouse) be placed on the same work surface for use conveniently ?</u> | <input type="checkbox"/> | <input type="checkbox"/> |

**Work desk and chair**

- |  |                          |                          |
|--|--------------------------|--------------------------|
| 3. Is the work desk providing adequate leg clearance and the chair adjustable (height within 40 - 50cm from the floor and tiltable backrest) to allow proper work postures ? | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|

**Environment**

- |  |                          |                          |
|--|--------------------------|--------------------------|
| 4. Are glare and reflections being avoided ?   | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Is the lighting level adequate (300 - 500 lux <u>if document reading is required</u> ), <del>and the environment free of noise disturbance (below 60 dB(A)).?</del> | <input type="checkbox"/> | <input type="checkbox"/> |

**Other workstation problems that may need attention :**

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**Part B : Conclusions and Follow-up**

(a "No" answer for any of the above questions or the reporting of workstation problems may indicate the presence of safety and health risks requiring follow-up actions)

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Assessor : \_\_\_\_\_

Date: \_\_\_\_\_