Fitness for Work Guidelines

A comprehensive guide for all <COMPANY> employees outlining the requirements for fit and healthy employees in the workplace.
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1 Purpose
This Guideline document is provided to support the Performance Management Policy and to assist Managers, Supervisors and Employees in its effective application. It presents an overview of what constitutes being ‘fit for work’ (FFW) and provides procedures for dealing with employees that are not ‘fit to work’.

2 Scope
This guideline applies to:
- all Australian based Staff and Wages employees of <COMPANY>

3 Introduction
It is recognised that when a person works excessive hours, they may be subjected to additional physical demands resulting in increased risk of injury. In addition, their performance may be impaired by fatigue, reducing efficiency and safety awareness.

Therefore, these Guidelines ensure that the risk of fatigue related incidents is reduced consistent with our aim of providing a safe workplace for our employees and contractors, keeping in mind business requirements.

4 Roles and Responsibilities
Fatigue is an issue that affects employees in different ways. Reducing the risks associated with fatigue is a shared responsibility that requires reasonable actions to minimise the risk of fatigue related accidents and injuries.

4.1 General Managers
General Managers are responsible for ensuring the adoption, implementation and application of the FFW Policy.
- Leadership - General Managers are expected to lead by example as this is essential to the FFW procedures’ success and credibility.
- Implementation - General Managers will arrange for Supervisors to be trained in, implement and apply the FFW Policy.
- Provision of resources - General Managers will provide adequate resources for education, training, counselling and the other requirements of the FFW Policy.
- Consistent application of the FFW Policy - General Managers are responsible for the fair and consistent application of the FFW Policy. In particular, Individuals who seek assistance will not be disadvantaged and their employment rights will be safeguarded.
- Confidentiality - General Managers are responsible for establishing appropriate procedures and facilities so that sensitive medical and other personal information is safeguarded.
- Review - The HR Manager will review the FFW Policy and the FFW Procedures from time to time to determine their appropriateness for <COMPANY>’s requirements.

4.2 Supervisors
- Leadership - Supervisors are expected to lead by example as this is essential to the FFW Procedures’ success and credibility.
- Implementation - Supervisors are responsible for leading the effective implementation of the FFW Policy.
- Fostering active cooperation with the FFW Policy - Supervisors will implement and manage the FFW Policy in a way which encourages Individuals to raise concerns about their own or other Individuals’ fitness for work.
• Compliance with FFW Policy training requirements - Supervisors are responsible for facilitating Individuals’ compliance with the FFW Policy training requirements.
• Assessment of fitness for work - Supervisors are responsible for making an assessment of the fitness for work of Individuals, both at the start of and throughout the work period.
• Action required when an Individual is unfit for work - Supervisors must take prompt and appropriate action whenever they believe that any Individual is not capable of working in a safe and effective manner.
• Confidentiality - Following all requirements with respect to confidentiality.

4.3 Individuals

Each Individual is responsible for their own health and safety at work and must avoid adversely affecting the health and safety of any other Individual.

• Reporting for work in a fit condition - individuals must be fit for work when they present for work and must be able to carry out their duties without risk to themselves or others.
• Demonstrating fitness for work upon request - An individual must, if requested by a Supervisor, satisfactorily demonstrate that they are fit for work.
• Notification of any actual or potential impairment of fitness for work
• Individuals must notify a Supervisor if they believe they may be unfit (whether totally or partially) for work.
• If an individual has a medical condition that could affect their fitness for work, that individual must inform the OH&S Manager of the likely impact of the medical condition on their fitness for work.
• Where appropriate, a medical certificate must be provided by the Individual to their Supervisor.
• Appropriate use of medication. Individuals are required to:
  • discuss with the prescribing medical practitioner the inherent requirements of their job and the likely impact of any medication on their safety or fitness for work; and
  • take any medication strictly in accordance with the medical practitioner’s, chemist’s or manufacturer’s recommendations.
• Notification of breaches of the FFW Policy - All individuals must notify their Supervisor of any situation in which the FFW Policy may have been breached. This includes:
  • any situation in which other Individuals may be unfit for work;
  • the unauthorised possession or consumption of drugs or alcohol on site or during the work period by another Individual; and
  • any other apparent breach of the FFW Policy.
5 Fatigue

5.1 Definitions

5.1.1 Work related fatigue

Work related fatigue might arise from situations requiring concentration for extended periods during work hours, working in extreme temperature or working in high-risk situations.

5.1.2 Non-work related fatigue

Non-work related fatigue is generally the result of poor quality or inadequate sleep which may be caused by a number of reasons, including sleep disruption, ill family members, distress, moonlighting (a second job) and domestic responsibilities.

5.2 Information on Fatigue Management

<COMPANY> will provide appropriate information and education on the causes of and management of fatigue and will arrange for all individuals to be made aware of their responsibility to prevent impairment of their fitness for work by fatigue.

5.3 Catnaps

- Where a shiftworker advises of, or is found to be, fatigued, their Supervisor will have the discretion to allow the shiftworker to have a ‘catnap’.
- This can only take place at the workplace, in areas such as the crib room or the Supervisor’s office, and should be for a period of no more than 20 minutes with another 10 minute recovery period.
- The Supervisor of any person requiring regular ‘catnaps’, even after being given advice on how to manage their sleep, is to seek assistance and counselling for the person via their Supervisor and the OH&S Manager.
- If after counselling a shiftworker is found not to be able to control their fatigue, that is they are not able to present themselves fit for work consistently, consideration will be given to take the shiftworker off shift work.

5.4 Leaving the Site

- Individuals who consider themselves unfit to drive home due to fatigue should report the problem to their Supervisor so that <COMPANY> can take reasonable steps to get the Individual home safely or provide a place to sleep.
- Individuals found to be fatigued due to non-work related circumstances may be required to leave the site. The relevant Supervisor is to make arrangements for the Individual to get home safely or provide a place to sleep.
5.5 Management of Shift Lengths and Rosters

Rosters and shifts should be designed and monitored to minimise their impact on Individuals’ fatigue including:

- Shift and roster patterns will be designed to, wherever practical, result in standard shift lengths that do not exceed 12 hours;
- General Managers or their delegates will monitor shift lengths and rosters to prevent excessive time spent at work;
- General Managers or their delegates will take travel time to and from work into account in determining the likely impact of fatigue on fitness for work and will consider this when determining shift lengths and rosters;
- All current and future shift patterns worked on site will, if they have not already been, be independently risk assessed for fitness for work; and
- Residential positions standard roster hours will not exceed <ENTER HERE>.

<COMPANY> recognises that some contractors work patterns may not currently comply with the standard rostered hours defined within this policy. <COMPANY> will work with its contractors to progress them towards achieving the required rosters. Where immediate compliance cannot be achieved a fatigue management plan must be implemented to the satisfaction of the Site Manager.

5.6 Overtime

5.6.1 More than 12 Consecutive Hours

- Where Individuals are required to work more than 12 consecutive hours (and it is not part of an approved roster), approval must be obtained from the Supervisor.
- Prior to giving approval, the Supervisor must assess the risks associated with extending the working hours. To do this they must complete a FFW Risk Assessment Form and include in their considerations how the Individual will get back to their accommodation or residence (i.e. do <COMPANY> need to organise accommodation or transport).
- Where the Supervisor believes it is safe to proceed, they can grant approval. As part of this process any controls identified as part of the risk assessment should be implemented.
- As part of this process the Supervisor should consider alternative ways of completing the task that would not require the Individual’s shift to exceed 12 hours, or the possibility of deferring the task until their next shift.

5.6.2 More than 14 Consecutive Hours

- Under normal circumstances no Individual will work more than 14 consecutive hours

5.6.3 Exceptional Circumstances

- Only in exceptional circumstances and with the approval of the Site Manager, can an individual work more than 14 consecutive hours. Circumstances are to be assessed on a case by case basis by the relevant Site Manager. The Site Manager will make their assessment on the justification and fatigue management plan submitted for their consideration. The fatigue management plan is to be both monitored and reported against to the Site Manager once the work requirement has been completed.
- In line with workers compensation requirements, for those who are required to travel to a location other than their normal place of work the time shall be calculated from the time they leave home and return home.
- Overtime shall not be approved at the end of nightshift, other than when incurred as part of a standard handover (i.e. hot seat change requirements)
5.7 Callouts for Breakdowns

Individuals can be requested by a Supervisor to attend for work to assist with breakdowns. Where an individual is to be called in, the Supervisor(s) must:
- conduct a risk assessment by completing a FFW Risk Assessment Form;
- decide if it is safe to proceed; and
- implement any controls identified as part of the risk assessment.

5.8 Coverage of Overtime Shifts

Individuals can be requested by a Supervisor to attend for work to provide overtime shift coverage.

Where more than 8 hours notice is given to an Individual, the Supervisor must direct the Individual to rest, not to consume alcohol and to take any other steps that may be required for the Individual to present fit for work.

Where less than 8 hours notice is given to an Individual, the Supervisor(s) must:
- conduct a risk assessment by completing a FFW Risk Assessment Form;
- obtain approval from the Site Manager or their delegate; and
- implement any controls identified as part of the risk assessment.

5.9 Limitations on Consecutive Shifts Worked

Individuals will not be requested to work more than one additional consecutive shift in addition to their normal rostered days without the prior approval of the Site Manager or their delegate. To do this they must have the onsite supervisor complete an assessment using a FFW Risk Assessment Form, and require that any identified controls are implemented.

5.10 Breaks

The following standards will apply in regard to breaks:
- A minimum 10 hour break must be taken between shifts.
- Where the break between night and day shift is less than 48 hours, the Supervisor must conduct a risk assessment by completing a FFW Risk Assessment Form and implement any controls identified as part of the assessment.
- <COMPANY> must provide appropriate rest and meal breaks during shifts.

5.11 Appropriate On Site Accommodation

<COMPANY> will arrange for accommodation at the single persons quarters to be designed and maintained to optimise sleeping conditions. This will cover both physical conditions (light and sound proofing, air conditioning, comfortable sleeping furniture) and environmental management (noise and activity restrictions at sleeping times).

5.12 General Measures to Minimise Fatigue

<COMPANY> will take all practical steps to minimise fatigue and its effects including:
- educating Individuals on the effects of fatigue, especially on alertness and performance;
- providing Supervisors with the skills to assess fatigue and the authority to direct fatigued Individuals to cease work;
- reassessing work requirements to allow extra time for tasks when Individuals are likely to be fatigued;
requiring written instructions and other checking procedures to counteract the impairment caused by fatigue on short term memory and verbal communication;
where possible, rescheduling easy, short, interesting tasks to times when Individuals are most likely to be affected by fatigue;
modifying the physical environment to reduce the impact of fatigue (eg. using bright lighting to stimulate alertness); and
ensuring that individuals have access to professional counselling through the EAP to address any problems that may cause or compound fatigue.

Employees who continue to present for work in an unfit state and are unable to complete the work of their role as a result of fatigue will be dealt with fairly and consistent with other work performance issues. For employees, this may include disciplinary processes. For contractors, this may result in discussions with the contractor Principal and may lead to removal from site.

5.13 Managing fatigue – the Individual’s Role

1. General obligations
- Individuals must be fit for work when they present for work;
- Individuals have a responsibility to effectively manage fatigue issues to prevent fatigue from impacting on their fitness for work;
- Individuals must obtain adequate sleep to prevent fatigue;
- Individuals must exercise particular care to prevent fatigue at critical times such as returning to site after a break or at shift change;
- Individuals who feel seriously fatigued while on shift must inform their Supervisor and must not remain on shift if they present a hazard to themselves or other individuals; and

2. Encouraging quality sleep
There are a number of steps which Individuals can take to promote quality sleep and reduce the effects of fatigue:
- encourage a quiet environment and discuss the need for quiet with family and friends;
- take a warm bath or shower;
- avoid mental stress just before bed;
- turn off the phone;
- sound-proof the bedroom and use white noise such as a fan;
- darken the bedroom with thick curtains or alfoil on windows;
- control the temperature (a cool room is better than a warm room);
- control the humidity;
- use a comfortable bed;
- use sleeping aids like blindfolds and ear plugs;
- go to bed with an empty bladder (however, due to the slowing down of the body’s functions at night coupled with the lower temperatures, fluid intake is usually reduced by shift workers when working night shifts which can cause mild dehydration. An adequate intake of fluids during the night can stop dehydration, but too much can increase the desire to urinate while sleeping. Trial and error is the best method to find the right balance);
- avoid caffeine five hours before bedtime;
- avoid exercise just before bedtime;
- eat a light snack before bed but never going to bed with a full stomach;
- avoid alcohol;
- increase general fitness levels; and
• avoid sleeping pills which can be addictive and can cause drowsiness during the next shift. Most sleeping tablets will show up on drug tests, making the Individual unfit for work.

3. Promoting alertness at work
   Individuals can try these steps to stay alert on the job:
   • discuss the need for short breaks during the shift with your Supervisor;
   • try and work in a buddy system. Talking with others can help keep you alert and co-workers can be on the look out for each other for signs of drowsiness during the shift;
   • try and exercise during breaks. Take a walk in the cool night air rather than sit around the cribroom;
   • try and eat three healthy meals a day, avoiding foods that upset your stomach;
   • if you drink caffeinated drinks, do so before 3.00am when on nights; and
   • exchange ideas with your workmates to cope with the demands of shiftwork.

5.14 Assessment of impairment due to fatigue

5.14.1 Site assessments

<COMPANY> will assess the impact of the following on fatigue:

• work rosters;
• shift lengths;
• work design and environment;
• accommodation conditions; and
• characteristics that may predispose Individuals to fatigue such as chronic illness, obesity, sleeping disorders and age.

<COMPANY> will also conduct random audits of hours worked to assess compliance with roster and overtime management requirements.

5.14.2 Self assessment

Every Individual has a responsibility to monitor and assess their own level of alertness at the start of and throughout the work period.
6 Prescription Medication

In the event that an employee is taking prescription medication and has reported to site for duty, then the following procedure will apply:

1. The employee will notify their Supervisor that they are taking prescription medication before commencing shift.

2. If the medication can cause drowsiness (such as Panadine Forte or any other strong codeine / narcotic based painkillers) then:
   - The Supervisor will notify the Emergency Services Coordinator (ESC).
   - The ESC will decide whether or not the employee can start their normal duties.

3. If suitable alternate duties can be found then the employee may remain at work under the direction of that Area Supervisor.

4. If no alternate duties can be found then their Supervisor will drive the employee home and they must produce a medical certificate for any shifts lost.

If employees have to prescription medication it is best that they notify their Supervisor prior to coming to work.

7 Drug and Alcohol

7.1.1 Identifying alcohol or other drug related problems

Supervisors and Managers should be aware that the misuse of drugs or alcohol by employees may affect the health or safety of employees or the public, as well as having adverse effects on work performance, behaviour or attendance at the workplace.

7.1.2 Intervention

Supervisors and Managers who feel an employee’s unsatisfactory performance may be drug or alcohol-related should arrange to hold a meeting with the employee. At the meeting the individual should have his or her unsatisfactory performance/conduct and ‘indicators’ discussed. The Supervisor should restate the company’s required standards, making sure the employee understands what is expected of him or her. The Supervisor should also try to establish the cause of the problem (although it must be pointed out that individuals with a drugs or alcohol problem will often go to great lengths to conceal the situation).

The Supervisor should issue warnings appropriate to the situation and consistent with the company’s policy, following up with further meetings and eventually disciplinary action if the situation is not rectified.
7.1.3 Treatment

Where employees acknowledge that they have a problem and are given help and treatment, this will be on the understanding that:

- while they are undergoing treatment, they will be on sick leave and will be entitled to the usual company sick pay benefits; and
- every effort should be made to ensure that on completion of the recovery programme, employees are able to return to the same or equivalent work.

However, where such a return would jeopardise either a satisfactory level of job performance or the employee's recovery, the Supervisor or Senior Management will review the full circumstances surrounding the case and agree a course of action to be taken. This may include the offer of suitable alternative employment, or the consideration of retirement on the grounds of ill health or dismissal. (Before a decision on dismissal is made, it should be discussed with the employee and an up-to-date medical opinion obtained.)

7.1.4 Relapse

Where an employee, having received treatment, suffers a relapse, the company will consider the case on its individual merits. Medical advice will be sought in an attempt to ascertain how much more treatment/rehabilitation time is likely to be required for a full recovery. At the company's discretion, more treatment or rehabilitation time may be given in order to help the employee to recover fully.

7.1.5 Recovery Unlikely

If, after employees have received treatment, recovery seems unlikely, the Company may be unable to wait for the employee any longer. In such cases, dismissal may result but in most cases a clear warning will be given to the employee beforehand, and a full medical investigation will have been undertaken.

In certain cases, strictly at the discretion of Management, early retirement may be considered.

7.2 Serious misconduct caused by alcohol or drugs

7.2.1 Intoxicated employees

If an employee is known to be, or strongly suspected of being, intoxicated by alcohol or drugs during working hours, the person’s Supervisor will be consulted. Arrangements will be made for the employee to be escorted from the company premises immediately. Disciplinary action will take place when the employee has had time to become sober.

7.2.2 Consumption of alcohol on the premises

Employees are expressly forbidden to consume alcohol when at work or to bring it onto company premises under any circumstances. Any breach of this rule will result in disciplinary action being taken which is likely to result in summary dismissal.

7.2.3 Drug use on the premises

Employees who take drugs which have not been prescribed on medical grounds will, in the absence of mitigating circumstances, be deemed to be committing an act of gross misconduct and will thus render themselves likely to be summarily dismissed as will any employee believed to be buying or selling drugs, or in possession of unlawful (that is, unprescribed) drugs.
7.2.4 Training and Development

Supervisors and Managers will be given training in order to develop ‘early recognition’ techniques for identifying any employee misusing alcohol or drugs. Effective interviewing and counselling skills will be developed so that employees can be dealt with promptly, tactfully and firmly.

All staff will be made aware of the possible consequences of alcohol and drug misuse for their continued employment with the organisation. They will be encouraged not to cover up for employees with a drink or drug problem but to recognise that collusion represents a false sense of loyalty and will in the longer term damage those employees.

Employees who recognise that they have a drink or drug problem, or that they are at risk of developing one, should be encouraged to come forward for confidential help. Contacts at outside agencies where help can be obtained will be made readily available to all staff via the company notice boards.

8 Assessment of Fitness for Work

8.1 Assessment Methods

<COMPANY> will adopt the following FFW assessment methods:
- Individual self-assessment, including self-testing for alcohol;
- Face to face discussions between Supervisors and Individuals at the start of and/or during the work period;
- Medical assessments;
- Drug and alcohol testing; and
- Other recognised assessments as appropriate.

8.2 Emergency out of Hours Responses

In an Emergency Situation, the Site Manager may request Individuals to attend on site at short notice in circumstances which would otherwise breach the FFW Policy.

The Site Manager, in deciding whether the Emergency Situation warrants bringing the individual on site under such circumstances, will assess all relevant factors, including:
- the consequences if the situation is not attended to, including the threat of serious injury or potentially significant environmental damage; and
- the risks to the safety of the Individual asked to respond.

Where it is determined that the individual shall be brought onto site to work, notwithstanding that it would otherwise breach the FFW Policy, the Site Manager must put appropriate controls in place.

The Site Manager will respect the individual’s decision if they believe they are not fit to undertake the required task.

For any emergency call-outs, the risk assessment and controls must be documented by the Site Manager or their delegate (use a FFW Risk Assessment Form).

A summary of the incident and circumstances surrounding the emergency call-out must be reported to the General Manager.
9 Management of Employees with Fitness for Work Issues

9.1 Primary Objective

The primary objective of the management of employees with fitness for work issues is to facilitate the employee’s prompt and safe return to the workplace. All concerns relating to employees’ fitness for work should be resolved in an effective, constructive and inclusive manner.

9.2 Limitation of Involvement to issues of Legitimate Concern

<COMPANY> will only become involved in managing an employee’s behaviour where it has the potential to impact on the employee’s fitness for work.

9.3 Action Required when an Employee is Unfit for Work

Supervisors must take prompt and appropriate action whenever they believe that an employee is not capable of working in a safe and effective manner. A positive test result for drugs or alcohol will deem the employee to be unfit for work.

The employee must be immediately isolated and removed from the workplace and prohibited from driving a vehicle or operating any machinery. Whenever an employee is isolated from potential hazards, the Supervisor must notify Human Resources personnel in writing of the circumstances as soon as possible.

The employee will be transported back to their place of accommodation or the single person’s quarters (SPQ) where required.

In cases where an immediate danger exists as a result of an employee’s state (e.g. drug overdose or potential for suicide), the Supervisor will take appropriate action which may include contacting the police and/or obtaining appropriate medical assistance.

The employee will be prevented from returning to work until such time as they have undergone appropriate discussions with their Supervisor and are able to demonstrate that they are fit for work. <COMPANY> will require reasonable proof from the employee that the concern has been satisfactorily resolved prior to the employee being permitted to return to work. <COMPANY> reserves the right to suspend payment of salary if the employee unreasonably refuses or delays in providing this proof.

Should the employee have been deemed to be unfit for work as a result of a positive drug or alcohol test, they will be required to produce a negative result\(^1\) prior to their return to work. However, a negative test result is not in itself sufficient and the employee must demonstrate to <COMPANY>’s satisfaction that the cause of the problem has been addressed and will not reoccur. The responsibility for providing this proof rests with the employee who may choose to access assistance through the EAP.

<COMPANY> reserves the right to withdraw access to <COMPANY> allocated or custodial vehicles until such time as the employee has demonstrated they are fit for work.

9.4 Responsibility for Performance Management

Employees with fitness for work issues are accountable for achieving and maintaining an acceptable level in their job performance.

\(^{1}\) In the case of cannabis, due to its retention in the body, this will typically require two negative tests at least four days apart.
9.5 Access to Leave Entitlements

Following a confirmed breach of the FFW Policy, <COMPANY> will allow access to accrued sick leave during the period that an employee is unable to demonstrate they are fit for work. Should the employee have no accrued sick leave entitlements, accrued annual leave or long service leave can be used. If an Employee has no accrued sick, annual or long service leave entitlements, they will be on leave without pay.

9.6 Disciplinary Action

Disciplinary action up to and including termination may result for breaches of the FFW Policy.

As a general guide, termination will only occur in the event of a third breach of the FFW Policy. However, <COMPANY> will consider each instance on its own merits, including the circumstances of each individual employee and the severity of the breach. For example, an employee found guilty during a disciplinary investigation of supplying or dealing drugs to Individuals on site is likely to be summarily dismissed.

All written warnings issued under the FFW Policy shall remain valid for 12 months from the date on which they are issued.

9.7 First Breach

When a first breach of the FFW Policy has been found to occur, the Supervisor will discuss the breach with the Employee concerned. The discussion will focus on the following, as applicable:

- the FFW Policy and the obligations it places on the Employee;
- the unacceptability of the employee’s state or behaviour;
- the risk that such states or behaviours create for the safety of the Employee and other Individuals;
- the reasons why the employee breached the FFW Policy;
- the employee’s responsibility to demonstrate that the fitness for work issue has been effectively addressed;
- the consequences of the breach and any potential future breaches of the FFW Policy;
- notifying the employee that their fitness for work will be monitored for a period of up to 12 months. In the case of drugs or alcohol, this will include periodic follow-up testing for these substances;
- recommending that the employee access assistance to address the fitness for work issue. This could include appropriate medical assistance or making the employee aware of the EAP;
- require that the employee participate in the establishment of a FFW Plan;
- issuing the employee with an appropriate written warning which will reflect the key points covered in this process. A copy of the warning will be placed on the employee’s personal file; and
- in the case of drugs or alcohol, the fact that the employee will need to provide appropriate negative results before being able to return to work.

9.8 Second Breach

When a second breach of the FFW Policy has been found to occur, the Supervisor will discuss the breach with the employee concerned.

The discussion will focus on the issues listed in clause 9.7 above, as applicable, except that this time the likely result will be a final written warning that a further breach is likely to result in dismissal.
9.9 Third Breach

When a third breach of the FFW Policy has been found to occur, the Supervisor will discuss the breach with the employee concerned.

Disciplinary action up to and including termination is likely to occur.

9.10 Fitness for Work Management Plan

In cases where an employee has been found to be unfit for work, the Site Manager in consultation with Human Resources personnel will decide what standard of proof is required to demonstrate that the fitness for work issue is being managed and the circumstances under which the employee will return to work.

If <COMPANY> considers it necessary, a FFW Plan will be required. <COMPANY> will pay for the services of a mutually agreed external provider. Where an external provider cannot be mutually agreed, <COMPANY> will nominate one.

A breach by an employee of their FFW Plan will be considered a breach of the FFW Policy.

10 Management of Contractors

10.1 Definitions

The term ‘employee’ means a contractor’s employee, agent or subcontractor.

10.2 General Principles

All contractors must comply with their obligation to actively manage their employees’ fitness for work whilst on <COMPANY> sites to a standard which is consistent with the <COMPANY> FFW Policy and FFW Procedures.

<COMPANY> will reserve the right in relation to its contractual arrangements with all contractors to include contractors and their employees in any form of drug or alcohol testing conducted by <COMPANY>.

Where an employee is required to participate in a <COMPANY> testing program, the employee may be required to submit proof of their identity acceptable to the collector and sign a Consent Form (provided by medical agency) prior to the samples being taken. The consent required is to enable <COMPANY> to release the results of the test to the employee’s employer. Failure to provide consent will be considered a refusal to test and will be a breach of the FFW Policy.

Where a <COMPANY> Supervisor believes that an employee is not fit for work they will be immediately isolated and removed from the workplace and prohibited from driving a vehicle or operating any machinery. Whenever an employee is isolated from potential hazards, the Supervisor must notify <COMPANY> Human Resources personnel as well as the employee’s employer.

10.3 Nominated Contractors

Prior to commencing work on site, the contract principal will be provided with a copy of the FFW Policy and the FFW Procedures and be informed that the contractor and its employees will be required to comply with them.

Nominated contractors will be required to satisfy <COMPANY> that:

- they have established their own fitness for work policy and procedures which, in the opinion of <COMPANY>, are consistent with <COMPANY>’s FFW policy and procedures;
prior to commencing work on site, and whenever else reasonably requested to do so, they have informed their employees that they will be subject to the nominated contractor’s fitness for work policies and procedures;

- they have conducted appropriate education and training on the requirements of the nominated contractor’s fitness for work policy and procedures for all their employees on <COMPANY>’s sites;
- they regularly conduct their own fitness for work assessment program; and
- they have established appropriate disciplinary and management procedures for their employees who breach the contractor’s policy.

10.4 All other Contractors

All other contractors will be required to:

- inform their employees that they will be subject to <COMPANY>’s FFW policy and procedures whilst on <COMPANY> sites;
- conduct appropriate education and training on the requirements of the FFW policy and procedures for all their employees on <COMPANY>’s sites; and
- satisfy the <COMPANY> Site Manager or their delegate that an appropriate fitness for work management plan is in place after a breach and prior to the employee concerned being allowed back on site.

11 Visitors to Site

All visitors must be escorted whilst on site.

Visitors will not be subject to <COMPANY>’s drug and alcohol testing program. However, where it is believed that a visitor is not fit for work, they will be escorted from site and reasonable steps will be taken by <COMPANY> to protect the visitor’s safety.

The circumstances of any refusal to grant entry to site or revoking of site access permission for fitness for work reasons must be documented and Human Resources personnel must be informed.

12 Confidentiality

Confidentiality is vital in promoting the effectiveness of the FFW policy and all reasonable efforts, consistent with safety, legal requirements and common sense, must be made to maintain Individuals’ privacy.

Information relating to Individuals’ fitness for work must be transmitted, used and stored in a confidential manner.
### Document Information

#### Summary Information

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<thead>
<tr>
<th>Guideline Name</th>
<th>Fitness for Work Guidelines</th>
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#### Revision History

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#### Related Documents

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### Distribution List

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Confidential