

Fit for Duty

January 2023

1 Scope

This procedure covers the physical, mental, and emotional fitness requirements for Industrial Performance Services employees and subcontractors and associated medical screening and monitoring.

2 Objective

The objective of this procedure is to achieve Zero Harm by ensuring personnel and subcontractors are sufficiently healthy in order to safely perform the tasks they are required to undertake.

3 Definitions

BAC - Blood Alcohol Concentration. A measure of the amount of alcohol in a person's body, usually using a breathalyzer unit. IPS★ITCS defines zero BAC as 0.00%, or the equivalent breath alcohol level, taking into consideration medication that may contain some alcohol or other 'contaminant' effects.

Drugs - Drugs include illegal substances (e.g., amphetamines, marijuana, cocaine, opiates or methadone) and medication (whether prescribed or not), which may reasonably impair an employee's safety, work performance or behavior.

Fatigue - A state of mental or physical exhaustion that inhibits a person from being able to function normally.

IPS★ITCS – Industrial Performance Services, Industrial Tubular Catalyst Services

Stress – Emotional, mental, or physical strain that detracts from a person's ability to cope with the work environment.

4 Fitness for Work

As part of the IPS★ITCS Induction process, employees will be made aware of general health, safety and fit for work requirements. In addition, role and site-specific training and inductions will be provided, as required, and personnel deemed competent to perform the job allocated to them.

Also refer to ***HR.PRO.Employee Handbook.2022*** and the ***HSE.PRO.HSE Manual.2022***.

Supervisors are responsible for monitoring personnel behavior and performance to ensure they are fit for work at all times. This may be done using visual and other assessments as required. Education, awareness, assistance, detection and counselling should also be employed.

It is the responsibility of employees to ensure they are physically and mentally fit for work *before* commencing a shift, which includes notifying your supervisor if you are taking medication that may affect your ability to work in a safe manner (prescription or over-the-counter). Over-the-counter medications such as allergy or cold and flu medications could also impair one's ability to perform safely and must also be reported to their supervisor.

If an employee is not able to perform their duties safely due to their physical or mental state, they are responsible for notifying their supervisor. Employees must take responsibility for their own safety as well as not report to work in a condition as to endanger the safety of their fellow workers.

This procedure describes expectations and management processes, including:

- Alcohol and drugs;
- Awareness promotion;
- Disciplinary procedures.
- Employee Assistance Program; and
- Management of fatigue due to hours and conditions of work;
- Management of stress;
- Possible control measures;
- Types of impairment testing;

5 Risk Management

The level of health monitoring will depend on the potential for exposure, the type of work being undertaken and previous medical results. Minimum health monitoring requirements are detailed in the *Health Monitoring Requirements* table.

All employees and subcontractors may be subject to urine, alcohol and drug testing. Additional health monitoring may be required:

- To meet client requirements;
- If there is a reasonable likelihood of exposure; and
- For employees who participate in activities deemed as high risk by IPS★ITCS.

Additional monitoring will include base line testing, on the job monitoring and post job testing. Frequency will depend on the duration and associated risk.

The following activities may pose a high risk to personnel health and safety but is in no way an exhaustive list. Refer to the task specific procedures.

- ***HSE.PRO.Hearing Conservation.2022;***
- ***HSE.PRO.Inert Entry Operations.2022;*** and
- ***HSE.PROHazard Communication.2022***
- Also see ***HSE.FOR.Medical Assessment Form.2022.***

Health Monitoring Requirements

Employee Roll	Type of Monitoring		
	Pre-Employment	Annual	Exit
Office Staff	X		
Corporate	X		
Project Technician	X	X	X
Project Supervisor	X	X	X
Contractor	X	X	X

5.1 Operational Risks

It is a breach of IPS★ITCS health and safety requirements for any IPS★ITCS employee, subcontractor, or visitor to be involved in an activity that leads to the impairment (mental or physical) of any person.

A risk assessment must be completed, in line with **HSE.FOR.Risk Management.2022**, for all operational activities and documented on **HSE.FOR.JSEA.2022**. This assessment must consider possible health and safety risks and use ALARP (As Low as Reasonably Practicable) principals to manage the risks and implement controls.

6 Health Monitoring Program

IPS★ITCS's health monitoring program is implemented by:

- Identifying personnel health risks:
 - See the predetermined table in the *Risk Management* section.
 - As per requirements specific to the type of work to be undertaken.
- Determining the frequency and type of monitoring required.
- Undertaking scheduled health monitoring.
- Assessing monitoring results.

Following up results that raise concern, with treatment and/or further testing, as is appropriate. All information regarding a person's fitness for work will be treated with strict confidentiality. Records will be managed by the Human Resources Department in line with **HR.PRO.Document Management Procedures.2022**.

6.1 Informed Consent

IPS★ITCS will seek consent prior to conducting health testing using **HR.FOR.Alcohol Drugs & Controlled Substances Acknowledgement.2022**. Participants must be informed about the reason for testing, substances to be tested, confidentiality and consequences of refusal.

6.2 Refusal / Non-attendance

If a person refuses to participate in, or attempts to avoid, a medical assessment, alcohol or urine drug screening, they will not be considered for activities that IPS★ITCS requires a medical assessment for and disciplinary action may be taken, in line with **HR.PRO.Disciplinary management procedure.2022**. The potential consequences of their actions must be explained to them. Further refusal/ avoidance will be regarded as a breach of IPS★ITCS policy and disciplinary action may follow. (Also see the *Managing a Positive Test Result* section.)

Consequences

- Personnel will be stood down, without pay, until they submit to testing and a positive result recorded.
- Personnel may be removed from a project site.
- Subcontractors and visitors will have workplace access withdrawn until they submit to a test and a positive result recorded.

6.3 Alteration / Falsification

Alteration of samples and falsification of information will be dealt with in accordance with **HR.PRO.Disciplinary Management Procedure.2022** and may result in termination of the individual's employment contract.

This will include the observation of urinary Creatinine, where urine samples with less than 1.8 mmol/L may suggest alteration. Similar observations may be made for the presence of nitrite, glutaraldehyde, bleach, pH, specific gravity and pyridinium chlorochromate.

6.4 Unfit for Work

Where personnel are deemed unfit for work, they will be stood down from duty. Disciplinary procedures may apply.

Persons in close contact with an employee, e.g. supervisor and work Crew, are in the best position to detect deteriorating work performance or social behavior. If there is a concern that a person is unfit for work, it should be raised with the supervisor immediately so that appropriate action can be taken.

Also see the *Symptoms* section.

6.4.1 Symptoms

Some of the symptoms that may indicate a person is not fit for work are listed below. These symptoms may be observed individually or in combination and should be considered as indicators only.

Work Performance

- Overall lowered work performance or productivity;
- Spasmodic Work Pace, often reaching capacity output, followed by a severe slump.
- Rapid deterioration of concentration and quality of work;
- Carelessness, increased mistakes and errors in judgment;
- Fatigue becoming more apparent; and/or
- Lies and excuses becoming a habit.

Poor Attendance

- Increased frequency of days or half-days off work;
- Repeated absence on Mondays or Fridays;
- Increased minor illnesses;
- Frequent lateness for work;
- Leaving work early;
- Extended lunch periods; and/or
- Unexplained disappearances from the job.

Unreliability

- An inclination to put things off;
- Neglect of details or sloppy handling of tasks;
- Tendency to blame others for shortcomings;

- Desire for a different job assignment; and/or
- Repeatedly seeking monetary loans from friends or colleagues.

Changes in Attitude or Habits

- Sensitivity about references to drugs or drinking;
- Avoidance of superiors or associates;
- Intolerance and suspicion of fellow workers; and/or
- Loud speech or conversely, dullness and tiredness during working hour.

Changes in Normal Physical Appearance

- Increased nervousness;
- Irritability;
- Abnormal skin appearance;
- Hand tremors;
- Swelling or flushing of the face;
- Red or bleary eyes;
- Neat individuals may become slovenly; and/or
- Casual people may become deliberately concerned with dress and appearance.

Hazards to Health and Safety

- Frequent injuries and lost time owing to accidents on and off the job can occur as a result of the following:
- Careless handling and maintenance of equipment or machinery leading to accidents and breakdowns Risk taking following periods of low achievement;
- Lack of safety awareness becoming a threat to fellow employees; and/or
- Domestic problems, impending marital break-up, domestic violence and delinquent behavior by dependent children.

7 Medical Assessments

The HR Manager is responsible for ensuring health assessments and monitoring are carried out. Project Managers are responsible for ensuring that current and appropriate medical results are available for Crew members before work commences.

Medical assessments cover the person's general medical history, vaccinations, occupational history, urine test for drugs, hearing checks, eye sight checks and a physical examination, etc.

The employee will complete their personal details and medical history on ***HSE.FOR.Medical Assessment.2022*** and an independent medical practitioner will review the information and perform testing in a controlled environment.

Taking medication (prescription or over-the-counter) may affect a person's ability to work in a safe manner, and drug and alcohol test results; therefore, the employee must declare this medication to their supervisor, or the HR Department, before commencing work.

This information will be held confidentially of file and destroyed after the employee verified, they have ceased taking the medication. A risk assessment of the employee's ability to undertake their duties may be required.

7.1 Pre-employment Medicals

All applicants must undertake a pre-employment medical before an offer of employment, verbal or written, is issued. The degree of testing will be in line with the type of role being offered.

The use of prescription medication will be investigated before a position is offered. A positive result to an illegal substance, during a pre-employment medical, will conclude the assessment.

Pre-employment medicals shall also be undertaken when changing not certain job functions and different

7.2 Annual Monitoring

At risk operational employees will undergo medical monitoring at least Bi-annually, to determine their fitness to continue working.

High risk activities may require more frequent and specific health monitoring. (See the *Risk Management* section.

If a positive drug or alcohol test is returned, the process outlined in the ***HR.PRO.Disciplinary management procedure.2022*** will apply.

7.3 Exit Medicals

At risk operational employees will undergo a medical assessment as near as possible to their last day of employment.

7.4 Assessing Results

The HR Manager is responsible for ensuring health results are reviewed and notify employees of the results no longer than 72 hours after testing.

The following personnel are authorized to access medical information:

- Chief Executive Officer;
- General Managers;
- Human Resources Manager and Recruitment Officer;
- HSEQT Manager; and
- The person whom the information pertains to.

8 Drugs and Alcohol

Drugs and alcohol can adversely impact an individual's ability to safely and responsibly undertake their work; therefore, IPS★ITCS applies both a scheduled and unscheduled testing program.

The results of any drug or alcohol screening will remain strictly confidential, in line with DOT or client facilities as per ***HR.PRO.Alcohol Drugs & Controlled Substances.2022***

Personnel may be asked to submit to drug and alcohol screening at any time but will have the opportunity for a representative to be present.

IPS★ITCS employees and contractors **must not**:

- Use drugs or alcohol on an IPS★ITCS or client site;
- Use drugs or alcohol before attending an IPS★ITCS or client site; or
- Bring drugs or alcohol onto an IPS★ITCS or client site.

8.1 Discrimination

If an individual believes they are being unreasonably singled out for repeated testing they should report this to the HR Department. The HR Department will investigate circumstances behind repeated testing.

Where an individual makes repeated, unsubstantiated allegations about another individual's fitness for work, action may be taken in line with ***HR.PRO.Code of Ethics and Confidentiality.2022***

8.2 Tolerance

- The maximum permissible blood alcohol concentration is 0.00%.
- The testing limit for drug testing is zero.

8.3 Frequency

The frequency and selection Criteria for testing will be determined by the General Manager and HSEQT Manager. Testing may be undertaken randomly following observations by a supervisor. HSET Coordinators may organize testing and engage specialist service providers as required, or as part of a IPS★ITCS or client site testing program.

Samples sent to a laboratory must be accompanied by ***HSE.FOR.Alcohol Drugs & Controlled Substances Acknowledgement.2022***

8.4 Instant Testing

Reasons for instant testing:

- Client requirement, prior to project commencement;
- A person is suspected of being affected by drugs or alcohol;
- Immediately after a serious incident, accident or emergency; and
- Individuals may seek to self-test prior to commencing work (if kits are available).

If an employee or subcontractor observes anyone at the workplace acting in a manner that suggests they are affected by drugs or alcohol, they must report it to their supervisor immediately.

It is the responsibility of the supervisor to:

- an IPS★ITCS Where non-IPS★ITCS personnel are involved, escalate the matter to the client; and
- Where employee or subcontractor is involved, determine if there is reasonable cause to test them for drugs and alcohol by closely observing their actions, appearance and conduct.

The affected person will be asked to consent to testing and then will be accompanied to a designated location. A urine sample may be collected and/or saliva or breath test carried out.

8.5 Self-Testing

An employee may request to self-test their own alcohol levels, using a breathalyzer unit, or drug levels using a drug test kit before commencing work, if such facilities are available. If there are no self-test kits at the workplace the employee may attend a local medical Centre to undertake a test.

If the self-test is positive, the employee must inform their supervisor that they are not fit for work.

Employees must report all medications they are taking. Over-the-counter medications such as allergy or cold and flu medications could also impair one's ability to perform safely and must also be reported to their supervisor.

If an employee reports that they are unfit for work, the Supervisor must ensure:

- That the employee knows they should take action to minimize recurrences.
- The individual is made aware of support available within IPS★ITCS to minimize a recurrence.
- Arrange for transport of that employee to their place of residence.

8.6 Serious Incidents / Accidents

Wherever possible, employees directly involved in serious injury or incident will be drug and alcohol tested.

Employees involved in high-risk incidents will be tested for drugs and alcohol. Incidents will be assessed by the Project Supervisor or HSET Coordinator to determine if they are high risk (in line with **HSE.PRO.Incident Reporting and Investigation.2022**, e.g. medical treatment injuries, property damage, environmental spills or near misses).

The police (or other investigative authority) may be called and may assume responsibility for testing personnel, in addition to IPS★ITCS requirements.

Employees can return to work with no loss of earnings following a zero-test result.

8.7 Alcohol Testing Procedure

Breath testing for alcohol will be conducted by a person:

- Trained to maintain and store testing equipment.
- Trained to check and calibrate testing equipment;
- Who understands this procedure and relevant legislation;
- Informed about consent and individual rights; and
- Competent in the technical aspects of breath testing.

HSE Supervisors will maintain a calibrated Breath Alcohol Testing Device that complies with OSHA Standards. It must be used and maintained in accordance with manufacturer's instructions. When undertaking breath testing for alcohol:

- Confirm that the unit is within calibration date.
- Detail and demonstrate the process of supplying a breath sample to the testee.
- Take a sample from the testee.
- Show the testee their pre and posttest readings.

8.8 Managing a Positive Test Result

If any individual feels they are being unreasonably singled out for repeated testing, they should report this to the HR Department, who will investigate the circumstances.

The HR Department will investigate circumstances where an individual makes repeated, unsubstantiated allegations about another individual's fitness for work. Action may be taken in line with **HR.PRO.Code of Ethics and Confidentiality.2022**

When applicable, The IPS★ITCS Regional Manager and Area Coordinator must be notified if an employee has been removed from their site, so that they can notify the client.

9 Return to Work

Each fit for work case shall be managed in accord with the issues identified, in line with the ***HR.PRO.Safe Return to Work procedure.2022***

If the employee is unable to return a negative test result at the beginning of the next shift, IPS★ITCS may agree to allow a period of up to three months of leave without pay (annual and sick leave may be accessed at the discretion of the Manager). During this period the employee may seek external assistance (at their own expense).

When the employee considers they are fit to return to work, or at the end of the agreed period, the employee will submit another drug and alcohol test (at their own expense from an accredited laboratory). If a negative test result is not submitted, and there are no extenuating circumstances, the employee's employment will be terminated.

The person shall not return to work until a negative test result for both drugs and alcohol is received.

9.1 Post Return to Work

An appropriate monitoring program will be implemented when the employee returns to work, which will consist of routine testing (at the expense of the individual) on a monthly basis for six months, followed by bi-monthly testing for the following six months.

During this time IPS★ITCS may, at any time, request an instant random test outside of the above-mentioned testing (conducted at IPS★ITCS's expense).

9.2 Contractors and Visitors

When a contractor or visitor considers they are fit to return to work and are prepared to submit a test, they may do so (at their own expense, to a laboratory nominated by IPS★ITCS). They shall not return to work until a negative test result for both drugs and alcohol is received.

10 Responsibilities

Chief Executive Officer

- Approve plan and associated procedures.

General Managers

- Planning, implementation, and maintenance of our people's fitness for work.
- Work with the HSEQT Manager in the establishment of the Fitness for Work plan and, where required, work with the line Managers to implement employee assistance and disciplinary processes.

HSEQT Manager

- Oversee the implementation of the program and its continuous improvement.
- Ensure that time and resources are made available to educate employees on drug and alcohol issues.
- Assist Managers and Supervisors with implementation of the Fitness for Work procedure.

Regional/Project Managers and Supervisors

- Ensure that new employees receive a copy of and understand the Fitness for Work procedure as part of their induction.

- Ensure the client specified hours of work are not exceeded.
- Take reasonable precautions to ensure all individuals are in a fit state to work so as to minimize risks both to themselves and others.
- Take prompt and appropriate action whenever an individual is not capable of working in a safe and effective manner.
- Ensure new employees receive a copy of and understand the Fitness for Work procedure as part of their induction.
- Help employees to get assistance with drug and alcohol issues.
- Communicate the Fit for Work procedure to all employees and relevant contractors.
- Regularly review this procedure with relevant employees via Toolbox Training Session.
- Implement programs to affect the Fit for Work procedure.

Employees and Contractors

- Report for work in a condition in which they can carry out their duties without risk to themselves or others.
- Notify their Manager/Supervisor of any concerns about potential impairment of their fitness for work, including medication (prescribed or not).
- Notify their supervisor if they believe another individual may be unfit for work.

Revision History

Rev	Rev Date	Rev By	Approved By	Description
1.0	1/3/2022	Shayne Torrans	Shayne Torrans	Initial Procedure
1.1	11/23/2022	Shayne Torrans	Shayne Torrans	Format Revision

Approvals:

Procedure Owner

Print Name

Date

Signature

Competency Assessment

No.	Questionnaire	C/NYC
Q1		
A1		
Q2		
A2		
Q3		
A3		
Q4		
A4		
Q5		
A5		

Enclosed Attachments	
Risk Assessment	☒
Environmental Aspect and Impact	☒
Training and Competency	☒
Measure and Evaluation Tools	☒

Competency Checklist

To be filled out by Trainer and signed by Employee, Assessor and Supervisor before being returned to the HSEQT Manager for recording purposes.

Procedure	Competency	Date	Competent YES / NO	Employee Signature

(Please tick appropriate box)

This employee is competent in performing the job.

This employee has not attained the competency level.

*

* *If the employee has not attained all competency levels, the General Manager must assess the action to be taken, provide an extension of training or alternative action as listed below.*

Alternate action to be taken: _____

Signed By	Employee:	_____	Date:	_____
	Trainer:	_____	Date:	_____
	Assessor:	_____	Date:	_____
	Regional Manager:	_____	Date:	_____

Environmental Aspects and Impacts

Identified Environmental Aspects and Impacts

The following table is a summary of the likely environmental aspects and impacts that may be identified during site inspections. The significance of each impact needs to be assessed using the Risk Assessment Model.

Activity	Aspect	Impact
Purchasing & Administrative Work	Consumption of goods	Conservation of natural resources
	Consumption of energy (eg. Electrical equipment and facilities)	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss
	Generation of waste (eg. Paper)	Consumption of space for waste disposal; Habitat loss
Climate Control	Consumption of energy	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Habitat loss
	Generation of noise	Disturbance to community; Habitat loss
Cleaning of – offices / vehicles	Storage, use and release of chemicals	Contamination of air, water or soil; Risk to human health
Transport (Fleet vehicles / staff travel)	Consumption of energy	Release of greenhouse gases and atmospheric pollution; Consumption of natural resources; Loss of habitat at all stages of generation; Light pollution
	Consumption of goods (eg. Oil)	Consumption of natural resources; Generation of waste; Habitat loss; Biodiversity impacts
	Generation of waste (eg. Oil)	Consumption of space for waste disposal; Potential contamination of water or soil; Habitat loss
	Exhaust emission	Release of greenhouse gases and atmospheric pollution
	Use of dangerous goods (eg. Batteries)	Potential contamination of air, water or soil; Risk to human health
	Generation of noise	Disturbance to community; Habitat degradation
Operations		

Risk Assessment

Risk Assessment // insert name here

Step No: Logical sequence	Sequence of Basic Job Steps documented in the Procedure, Work Instruction and project plans. Break down Job into steps. Each step should be logical and accomplish a major task.	Potential Safety & Environmental Hazards/Impacts at the site of the Job Identify the actual and potential health and safety hazards and the environmental impacts associated with each step of the job.	Risk Rating Refer to the risk matrix or HSEQT.PRO. Risk Mgt	Recommended Corrective Action or Procedure <i>Determine the corrective actions necessary to reduce the risk to as low as reasonably practical (ALARP) refer to HSEQ.PRO.Risk Mgt. The risk must be reduced or controlled to ALARP before work commences.</i> Document who is responsible for implementing the controls to manage each hazard identified.	Risk Rating refer to the risk matrix or HSEQT.PRO.Risk Mgt
1.					
2.					
3.					
4.					
5.					

Audit

Process: insert// Procedure: Insert //			Date:	Audited by:
			Location of Audit:	Area Mgr/Supervisor:
Item	Question	Evidence Sited	Comments	Conformance Score 0,3,5
1.				
2.				
3.				
4.				
5.				
6.				
7.				
AUDITOR'S SIGNATURE: SAFETY REP'S SIGNATURE:		CONFORMANCE SCORE: / 25 CONFORMANCE %:		0 – Non-Conformance 3 – Continuous Improvement Opportunity 5 – Total Conformance