



IGO GROUP OCCUPATIONAL HEALTH STANDARD 1

Fitness for Work and Wellbeing

INDEPENDENCE GROUP NL

DOCUMENT APPROVAL FOR USE

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1. PURPOSE

This Standard describes the Independence Group NL (IGO) requirements for the management of employee health, fitness for work and wellbeing.

2. SCOPE

This Standard applies to all employees (a term taken to include contractors and visitors) working with IGO.

Where this Standard identifies Australian and New Zealand Standards, IGO will ensure any other standards relevant to a specific jurisdiction meet the minimum requirements established through this standard.

3. DEFINITIONS

“**Alternative Duties**” means work duties that differ from the standard hours of work or type of work.

“**BAC**” means Blood/Breath Alcohol Concentration.

“**Confidentiality**” means:

- (a) the ethical principle or legal right that a medical practitioner or other health professional will hold secret all information relating to a patient, unless the patient gives consent permitting disclosure; and
- (b) the nondisclosure of information except to another authorised employee(s) i.e. Resident Manager.

“**Confirmatory Testing**” is an analytical procedure that uses mass spectrometry to unequivocally identify the presence of a specific drug and /or metabolite.

“**DIDO**” means Drive In Drive Out of a site/operation.

“**Departmental Manager**” means any manager who reports to a Registered or General Manager.

“**Employee**” means any direct employee of IGO, any contractor or sub-contractor to IGO, any consultant to IGO or any visitor to an IGO site or premises. (Also see IGO Employee)

“**Employee Assistance Programme (EAP)**” is a programme that provides professional and confidential counselling for a range of employee and work problems to all employees, partners and their dependent children.

“**Fatigue**” means mental or physical exhaustion that stops an individual from being able to function safely.

“**FIFO**” means Fly In Fly Out of a site/operation.

“**Fit for work**” means the individual is in a state (physical, mental and emotional) which enables the employee to perform assigned tasks competently and in a manner which does not compromise or threaten the safety or health of themselves or others.

“**GCMS**” refers to the test know as Gas Chromatograph Mass Spectrometer which is used to confirm

the validity of original sample and determine the type and level of substance detected.

“IGO Employee” means any employee of IGO.

“IGO Worker or worker” means any person working on an IGO site including IGO Employees, contractors and subcontractors.

“IGO”, “we”, “our”, “Independence Group” means Independence Group NL including subsidiary companies.

“Illicit Substance” means any substance banned or made illegal by the government.

“Medical Certificate” means documentary proof of illness or confirmation of fitness for work as provided by registered medical practitioner.

“Misuse of Alcohol” means the consumption of alcohol which results in producing a test result exceeding the blood alcohol level prescribed by this Procedure (see Appendix 1).

“Misuse of Drugs” means:

- (a) The use of illegal drugs (illicit and synthetic substances such as marijuana, amphetamines, cocaine, opiates and other narcotics, synthetic) which produce a non-negative test result;
- (b) The use and/or misuse of prescription or non-prescription medication which results in the impairment of an employee’s ability to work efficiently and safely and/or which produces a test result which exceeds the limits prescribed in this Procedure.

“Negative Result” means a test result that fails to show the specific condition for which the test was being done.

“Non-Negative Test” the results of the employee’s drug test greater than the cut off level specified in Australian Standards 4308:2008, or as amended. A “non-negative test” for alcohol is defined as a reading greater than zero. (see Appendix 2).

“Non-prescription Medication” means medication which can be purchased over the counter without the need to provide a medical certificate.

“OHS” means Occupational Health and Safety.

“OHS Manager” means Occupational Health and Safety Manager.

“Prescription Medication” means medication which can only be purchased with a certificate provided by a qualified medical practitioner and being used by the employee for whom it was originally intended.

“Primary Test” means the first sample collected.

“Self-Testing” means the process by which individual test themselves using a Alcoholiser or similar test device prior to presenting themselves to the rostered shift.

“Supervisors” or “Managers” means any person responsible for the supervision and or management of an employee. The term supervisor is taken to include Managers.

“Testing for Cause” means testing conducted when there has been an incident, or IGO has reasonable suspicion of that person is not fit for work.

4. RESPONSIBILITIES

4.1 Employees

All Employees have a duty to:

- take reasonable care so as not to expose themselves or others to unnecessary health or safety risks. An important part of this duty is the responsibility to ensure that they are in a fit state to work at the start of, and throughout the work period, so that they are able to carry out their duties without risk to themselves or others;
- report situations where they are not fit for work or they become unfit for work during their work shift; and
- report situations where they observe behaviours of others which indicates that the person may not be fit for work.

4.2 Registered Manager

The Registered Manager is responsible for the effective implementation on this Standard on their site.

4.3 Supervisors

Supervisors have responsibility for the health, safety and welfare of all individuals under their control and to ensure that they are fit to perform the role for which they were employed. Their responsibilities specifically include:

- ensuring all individuals in their area of responsibility understand and comply with the requirements of this Standard;
- taking prompt and appropriate action when an individual's fitness for work is compromised; and
- ensuring that information received is treated confidentially.

4.4 OHS Manager or equivalent

The OHS Manager or equivalent is responsible for providing technical advice and assistance to facilitate the implementation of this Standard.

5. REQUIREMENTS

5.1 Legal and other requirements

The IGO Fitness for Work and Wellbeing Standard will be implemented in accordance with relevant legislation, regulations and company commitments.

Contractors and service providers are required to implement Fitness for Work and Wellbeing Standards and programs for their employees in conformance with this Standard.

Everyone entering an IGO site or workplace must be informed that adherence to this Standard is a condition of entry. Consequently, they must consent to:

- any drug and alcohol testing as per this Standard; and

- searches of their belongings for drugs and alcohol in accordance with the IGO Group Security Standard 1 – Property Security and Prohibited Items

Any employee or organisation refusing to grant consent will not be granted site or workplace access. Subsequent refusal to cooperate with testing or security requirements may result in disciplinary action, the removal of the non-cooperating parties from site, and or an issue of notice of breach of contract.

Everyone entering an IGO site or workplace must also be informed that participation in IGO’s health surveillance monitoring programs is a condition of employment and/or access to IGO sites.

5.2 Pre-employment medical assessment

IGO requires that all Employees complete a pre-employment medical prior to commencing employment with IGO. IGO requires that applicants disclose medical conditions and prescribed medications that may impact on their capacity to complete the job for which they have applied.

Pre-employment medical examinations will include a mandatory drug and alcohol screening.

Following the pre-employment medical, applicant’s medical information will be reviewed on a case by case basis. Consideration will be given to both the individual’s capacity and medical condition and the demands of the role for which they are being employed. If the medical assessment indicates a risk/s to the applicant’s and/or other employee’s safety or health, IGO reserves the right to not offer/or to rescind any conditional offers of employment to the applicant of employment with IGO.

Note: Employees (see definition) whom will be on site for less for than 7 days do not need to complete a medical subject to the approval of their Registered Manager. Managers shall give consideration to the nature of the work the employee is engaged to perform in making this decision.

5.3 Post-commencement of employment medical assessment

Occupational Disease Monitoring

From time to time, and or as required by law, IGO will complete health surveillance monitoring of employees for the purpose of preventing occupational diseases. This may include testing of an individual’s capacity, specific medicals and/or a requirement for an individual to carry sampling equipment to test their work environment.

As appropriate, IGO will provide the workforce or specific individual/s with information on such programs prior to the commencement of the monitoring. IGO will disclose the collective summary results to the affected work teams and the individual’s personal results to each participating individual. The latter information will be treated as a private medical record as per Section 9 of this Standard.

Ongoing Medical Assessment for Fitness for Work

As a duty of care, IGO requires that, and will support, employees to maintain an adequate level of functional capacity and fitness for work so as to enable them to complete the tasks involved in the role for which they were employed.

IGO will assess the fitness for work of individuals in its workplaces. The primary method for assessing an individual’s fitness for work is through face-to-face discussion between managers, Supervisors and the affected individual(s) at the start of, and during the period of, work. Where appropriate, other assessment methods may be utilised. These include:

- alcohol and drug testing (including alcohol self-testing);
- medical assessment; and

- other recognised assessments as appropriate.

Employees may be required to undergo a medical assessment where their Manager or Supervisor, in consultation with IGO HR, has reasonable grounds to believe that the Employee’s fitness for work may be affected by their physical or psychological state, injury, fatigue or any other condition. This assessment may also require referral to other professionals for specialist assessment.

5.4 Impaired ability to work

Medical conditions that could impair the ability to work

Some medical conditions can impair an employee's capacity to safely perform their job. These conditions include both those that are work related and those that are non-work related. Given the relative remoteness of some of our mining operations and exploration areas, some medical conditions pose a greater medical risk than would be the case given access to medical facilities as found in metropolitan areas. Consequently, once employed, employees have an obligation to disclose medical conditions (both illnesses and injuries) that could impair their ability to work safely. This disclosure must be reported to the Site Medic/OHS Manager or their Supervisor prior to the re-commencement of their duties or as soon as practical after they become aware of their condition.

Illness

All employees who are sick have a responsibility to ensure their own welfare. Employees who cannot attend work, or who feel that they need to leave work, must notify their Supervisor to provide details on the nature and expected duration of the absence.

Use of Drugs and Alcohol

Employees undertaking work for IGO must be free of alcohol, illegal drugs, and other psychoactive substances in the workplace. Intoxication, or the manufacture, sale, purchase, provision, use or possession of illegal drugs and other psychoactive substances on IGO sites is prohibited.

Prior to commencing a work shift, an employee must inform their manager if they are taking over the counter (legal) medications or prescribed drugs that may have side effects that could affect safety or the performance of their work (refer to Section 5.8).

The possession and use of or alcoholic beverages in Operational Areas is prohibited. The possession and use of or alcoholic beverages in other parts of IGO’s sites and premises is limited to those locations and times prescribed by the site-specific rules.

Employees deemed medically unfit to work by a medical practitioner

Where an employee is deemed medically unfit to work by a medical practitioner, they must not attend the workplace and must notify their Supervisor or Manager utilising the established site based protocol.

5.5 Injury Management

IGO has an Injury Management process (refer to the **IGO Group Occupational Health Standard 2 – Injury Management**) that must be adhered to for any injury or illness sustained in the workplace that results in an individual being absent from work or requires them to complete alternative duties. Typically, this would include a Return to Work Plan.

IGO may consider facilitating alternative return to work duties for Employees on a case by case basis following clearance to return to work by our company doctor.

Non-work-related injury/illness will also require medical practitioner clearance prior to recommencement of duties. A Return to Work Plan may be required for non-work-related injury or illnesses subject to medical advice.

If, following an illness and/or injury (including non-work-related injury/illness) an Employee's medical condition requires, or is managed by, Prescription Medication or Non-Prescription Medication, this must be disclosed as per Section 5.8.

5.6 Management of Employees who are otherwise Unfit for Work

Supervisors will undertake the following actions when an individual who is on site is deemed unfit for work for any reason:

- The employee will be immediately removed from the workplace and prohibited from driving a vehicle or operating any machinery;
- The employee will be transported back to their place of accommodation; and
- The employee will be prevented from returning to work until such time as they have undergone appropriate discussion with their Supervisor and are able to demonstrate that they are fit for work.

In cases where an immediate danger exists as a result of an employee's state (e.g. drug over dose or potential for suicide), the Site Medical staff will take appropriate action that may include contacting appropriate external assistance. The Supervisor will also ensure that the employee is made aware of the confidential Employee Assistance Program (EAP).

Where an employee has been removed from the workplace as a result of a positive alcohol test, they will be required to produce a negative result when tested on their arrival back at site, and may be required to participate in additional testing thereafter.

Where an employee has been removed from the workplace as a result of a positive drug test, they will be required to produce a negative test result prior to their return to work at the individuals cost.

It should be noted that a negative test result is not in itself sufficient to confirm Fitness for work. The individual must demonstrate to IGO's satisfaction that the cause of the problem has been addressed and will not reoccur. The responsibility for providing this proof rests with the individual who may choose to access assistance through the Employee Assistance Program (EAP) to assist them in this process.

5.7 Medical Certificates confirming Fitness for Work

All employees must provide a Medical Certificate to their Supervisor and/or mine site Medic prior to returning to an IGO mine site or exploration area (i.e. before boarding the plane or driving to site) as issued by a company approved medical practitioner in the following circumstances:

- Post-surgery which required a general anaesthetic or requires on-going wound management by on-site medical staff; or
- Post-acquiring a notifiable infectious disease; or
- After being transported from site for any medical treatment; or
- When the time away from the work site exceeds one (1) month.

- Following a non-work-related injury that has prevented them from work

In all of the above circumstances (and such other circumstances as IGO deems reasonable), IGO reserves the right to stand-down the employee (on normal pay) or require that they complete alternate duties until they provide adequate proof of their fitness for work.

Note: IGO may require that an employee who has suffered a significant non-work-related injury be 100% fit to return to all of their pre-injury duties prior to doing so.

Where a person arrives on site without the requisite medical certificate, IGO reserves the right to ask them to leave site (having taken reasonable steps to facilitate this).

5.8 Failure to make required medical disclosures or otherwise cooperate

Any employee failing to make the required disclosures either during the pre-employment or post-employment medical assessment programs, or any employee failing to cooperate with the lawful implementation of this Standard, will be deemed in breach of this Standard. Consequently, the employee will be subject to disciplinary action in accordance with the IGO Counselling and Discipline Procedure.

5.9 Fatigue prevention and management

Work involving long hours, long rosters, shift work, work that is stressful, physically or mentally demanding and activities that impact on sleep cycles can reduce fitness for work and increase the likelihood of a fatigue related incident. Such incidents may result in significant consequences.

Individual employees have a duty of care for their own health and safety and the health and safety of others which specifically includes Fatigue Management.

An individual employee's level of fatigue cannot be easily measured. Self-management of fatigue is by far the most effective control. However, as IGO also has a duty of care to assess and manage employee fatigue levels, this will be given effect by:

- Ensuring conformance to the IGO Extended Working Hours and Fatigue Management Plan (See Appendix 1);
- Education and training of the employees, particularly in self-management of fatigue; and
- Effective supervision.

5.10 Use of Medications

Medications may have psychological and/or physical altering properties that could impact on an employee's fitness for work. Employees must ensure that any prescription medication is taken safely. This requires that individuals:

- discuss with the prescribing medical practitioner the nature of their duties and ascertain any possible side effects of the prescribed medication which may impact on their ability to perform their duties safely prior to returning to work following prescription;
- notify their Manager/Supervisor or Site Medic/OHS Manager (Prescription Medication Declaration Form) of any medication they are taking which could affect their safety or performance at work;

- take all prescriptions medication strictly in accordance with the medical practitioner's or manufacturer's recommendations;
- report any side effects that may impact on their safety or performance at work to their medical practitioner and their Manager/Supervisor; and
- undertake to not supply medication prescribed to them to any other employee for the same or any condition.

5.11 Drug and Alcohol Testing

IGO will undertake a program of risk-based drug and alcohol screening of employees in the workplace. The **IGO Drug and Alcohol Testing Protocol** (Appendix 2) applies to everyone at an IGO site or work area.

Whilst IGO reserves the right to complete drug and alcohol testing at any location including, but not limited to, private company roads and property, company operated airports (including arrival to and departure from site) and of those individuals undertaking activities on behalf of IGO at any time, IGO will act to preserve the dignity of those affected. Further, IGO will not test anyone in their accommodation whilst on site unless there is reasonable suspicion of being under the influence.

5.12 Mental Health

IGO will implement a **Mental Health Program** to:

- Raise awareness regarding mental health and the impact that this can have on employee's;
- Present strategies for interacting with and managing employees with mental health problems particularly when they may appear to be unfit for work or present a risk to others in the workplace;
- Provide guidance in respect to managing behavioural emergencies; and
- Establish criteria for removing employees with significant mental health problems from the workplace and subsequently allowing their return to the workplace.

5.13 Employee Assistance Program

IGO will provide access to a range of confidential professional support and counselling services to support its fitness for work and wellbeing programs through its **Employee Assistance Program** (EAP). EAP will be available to all employees and the immediate family members of IGO staff.

Access to services can be:

- Through self-referral;
- Through the recommendation of supervisors or peers;
- Through referral from Occupational Health Practitioners; and
- Required as part of a disciplinary / mediation process.

The EAP service is also be available to Managers and Supervisors requiring guidance in relation to managing fitness for work and wellbeing related matters.

5.14 Healthy Lifestyle Programs

IGO have implemented a reportable Healthy Lifestyle Programs based on the needs of the workforce and the outcomes of health surveys and other relevant information. IGO's healthy lifestyle programs will include, but will not be limited to, monthly health screenings, presentations, posters and health promotions.

5.15 Smoking and Vaping

Neither smoking nor vaping is not permitted at any IGO site, office or work area except in nominated smoking zones and in accordance with the requirements of displayed signage. Site management is responsible for determining the location of smoking zones (in accordance with the law), if any.

Smoking and vaping will not be permitted in any aircraft, vehicles or mobile plant owned, leased or rented by IGO.

IGO will support employees wishing to participate in programs to quit smoking or vaping.

5.16 Absenteeism from work whilst resident on site

Where DIDO and or FIFO employees report in sick or are absent from work whilst in IGO provided accommodation, IGO has a continued duty of care to that employee. As such IGO reserves the right to visit that employee at their place of accommodation to check their welfare.

All unapproved absenteeism will be handled in accordance with the IGO Counselling and Discipline Procedure.

6. EDUCATION AND TRAINING

Training in relation to the requirements of this Standard will be developed and implemented for all Supervisors. All other employees will also be educated on this Standard and, at a minimum, these requirements will be addressed via the induction process.

7. PERFORMANCE MEASURES

Site conformance with this Standard will be assessed through regular audits and assessments.

Each site/ operating area shall keep a record of drug and alcohol testing statistics to demonstrate pro-active enforcement and compliance with this standard. Testing statistics shall be reported on a monthly basis.

8. FAILURE TO COMPLY

Failure to comply with this Standard or to co-operate in the process of administering this Standard may lead to one or more of the following actions:

- disciplinary action in accordance with IGO Counselling and Disciplinary Procedure; and/or
- removal from the IGO site; and/or
- Summary dismissal.

9. CONFIDENTIALITY

All employee medical information obtained by IGO is strictly confidential and will be managed in accordance with relevant statutory or regulatory requirements.

10. REFERENCE DOCUMENTS

- WA – Mines Safety and Inspection Regulations – 1995;
- WA – Mines Safety and Inspection Act – 1994;
- WA Occupational Safety and Health Act – 1984;
- WA Occupational Safety and Health Regulations – 1996;
- IGO Safety Management Plan;
- Australian Standard 4308:2008; and
- Any other State and Territory legislation.
- IGO Incident Management and Reporting Standard
- Counselling and Disciplinary procedure
- IGO Injury Management Procedure

11. ASSOCIATED FORMS

- Medication Declaration Form
- IGO Fatigue Risk Assessment Form
- Record of Conversation Form
- IGO Counselling and Disciplinary Form

12. APPENDIX 1: IGO EXTENDED WORKING HOURS AND FATIGUE MANAGEMENT PLAN

12.1 Fatigue Management

Employees must not work extended shifts or rosters that would affect their health or safety. IGO will facilitate this requirement through the implementation of this plan.

12.2 Self-Assessment for Fatigue

Employees are in the best position to recognise if they are too fatigued to perform their job safely. If the employee feels fatigued they must report to their Supervisor immediately.

If at any time whilst at work an employee self-assesses and concludes that they are fatigued, and hence are not fit for work, they are obliged to report their concern to their Supervisor.

Where it comes to IGO's attention that a person's total waking hours has or will exceed 19 hours at the end of any given shift, they will be deemed unfit for work.

12.3 Extended Shifts

If an extended shift is required it must be a) authorised on a case by case basis by the appropriate Departmental Manager and b) the following guidelines must be adhered too unless otherwise approved in writing by the Registered Manager:

- No shift of greater than 16 consecutive hours in a 24-hour period shall be performed on site;
- Where a 12-hour shift is extended up to 14 hours (i.e. 2-hour extension), the extension is only permitted subject to the approval of the Supervisor;
- Where a shift is extended beyond 14 hours (i.e. >2-hour extension), a written **Fatigue Risk Assessment** must be completed by the Supervisor with the assistance of an independent employee (such as the site Safety Officer or elected Safety Representative) prior to the commencement of the fifteenth hour of work;
- An employee working any shift of 14 hours or greater will be provided alternative transport to their place of residence or rest. (For example, someone drives the affected employee back to camp or they get a taxi home);
- The minimum break following an extended work period must be not less than 10 hours.

12.4 Extended Rosters

In general IGO will act with regard to the 'Managing the Risk of Fatigue at Work' (www.safeworkaustralia.gov.au/sites/SWA/about/Publications/Documents/825/Managing-the-risk-of-fatigue.pdf) and 'Working hours – code of practice' (www.commerce.wa.gov.au/publications/code-practice-working-hours).

Unless otherwise limited in law, IGO's maximum allowable permanent roster cycle (swing) is 21 consecutive twelve hour shifts at the workplace followed by 7 days on rest and recreation (ie 3 and 1 roster). Only one change from day to night shift, or vice versa, is permitted in any given roster cycle.

Subject to compliance with the law, if an extended roster is required each roster must be authorised on a case by case basis by the appropriate Departmental Manager and is subject to the following guidelines unless otherwise approved in writing by the Registered Manager;

- No employee will work more than 21 consecutive twelve hours shifts; and

- There should only be one day/night shift change in any given roster period.

12.5 Travel Time

Travel time may have a significant impact on the quality of any rest period between shifts and or rostered periods on site. Travel time is to be included when considering Extended Shifts and Extended Rosters.

For FIFO and DIDO employees, it is incumbent on the employee to make such arrangements as required to ensure that they arrive at the mine site, exploration area or other location fit for work.

12.6 Broken Shifts or Call Outs.

Employees working broken shifts must not be required to work more than 12 hours in any 24-hour period.

The minimum break following a broken shift or call-out must be not less than 8 hours except where a Fatigue Risk Assessment has been completed, and a shorter break has been deemed acceptable.

12.7 Fatigue Risk Assessment

Supervisors must conduct a Fatigue Risk Assessment as required by this standard or in such other circumstances as they think reasonable.

The Fatigue Risk Assessment will be completed using the **IGO Fatigue Risk Assessment Form** provided on IGO forms link.

When completing the risk assessment, the following factors should be considered:

- Number of hours awake for the individual preceding the shift (including travel times, quality of sleep);
- Any use of prescribed substances and alcohol;
- The degree of attributable fatigue an employee would be expected to experience across those working hours when performing that task;
- The degree of experience an employee has in performing the task and the level of supervision required to be provided throughout the task;
- The nature of the task (e.g. high / low critical tasks, physical and mental demands, etc.);
- Recognised exposure rates and required adjustments to workplace environments (e.g. heat, noise, vibration or chemicals); and
- The cumulative nature of sleep deprivation.

Where extended working hours are being considered, Defined Hazardous Work **must** be avoided. Refer to IGO-0171-Group Safety Standard 3 – Personal Risk Management for more information on Defined Hazardous Work.

12.8 Stand down

A Supervisor can stand down anyone of their direct reports (with pay), including contractors if they believe that the individual is not fit for work.

12.9 Unreported Fatigue

If an incident (including a near miss event) occurs that results in damage of company assets, employee harm or harm to others as a result of unreported fatigue, disciplinary action may be taken in accordance with IGO Counselling and Disciplinary Procedure.

12.10 Repeated Fatigue Occurrences

If an employee is frequently affected by fatigue and the individual is unable to attend multiple days of work or is unable to perform his/her normal work duties, the employee's suitability for that particular role will be subject to review.

13. APPENDIX 2: IGO DRUG AND ALCOHOL TESTING PROTOCOL

13.1 Overview

IGO will test people for the presence of drugs and alcohol. In general, the testing will conform to the process and limits specified in:

- AS/NZS 4308:2008 Procedures for the collection, detection and quantitation of drugs of abuse in urine; and
- AS3547:1997 Breath alcohol testing devices for employee use.

With regard to drug testing, IGO reserves the right to test for any illegal drug or the use of prescription drugs that may be used illegally.

13.2 Timing of Screening Tests

Alcohol Self-Testing

Self-Testing is encouraged if an Employee or visitor feels that they may be affected by alcohol prior to commencement of their shift. Site shall provide breath alcohol a self-testing device(s) at the site's residential area. Further, all employees have the opportunity to request a test if they are in any doubt as to their fitness for work prior to a shift.

Each site shall define the geographic boundary at which point the mine employee is considered to have presented themselves fit for work and are no longer able to self-test. This point may be different for each site depending upon work location e.g. site boundary, change room, office etc.

An employee who fails an alcohol or drug self-test must not enter the workplace until they can produce a clear alcohol or drug test and report to their Supervisor immediately.

Drug & Alcohol Testing for Cause or Reasonable Suspicion

Where a near miss or an accident/incident occurs in the workplace, or where a Supervisor reasonably suspects an employee to be affected by drugs or alcohol, Testing for Cause or Suspicion will be conducted.

Drug & Alcohol Random Testing and or Blanket Testing

Random and or Blanket alcohol and/or drug testing will be carried out from time to time without notice at IGO's discretion. The methodology for both blanket testing and the selection of individuals for random testing will be determined by the site procedure relating to testing. Testing may be of a randomly selected group of individuals, an entire work team or the site's entire workforce.

Drug & Alcohol Post Incident Testing

Post incident drug and alcohol testing must be completed in the following circumstances:

- In the event of a 'Major' or more significant injury, incident or near miss (Refer to the IGO Incident Management and Reporting Standard), everyone physically involved in the task associated with the incident will be tested for alcohol and drugs to determine fitness for work; and
- Operators or drivers are to be drug and alcohol tested following all significant incidents involving mobile equipment, where the significance of the event is assessed by the operator's line management immediately following the event.

13.3 Sample types and collection process

IGO will employ breath alcohol measuring devices, and both urine and saliva drug testing kits.

Whilst breath alcohol testing may be completed in a public setting, all confirmatory testing and drug testing will be conducted in a way that achieves the maximum practical degree of privacy and confidentiality for individuals.

Testing and sample collection will only be conducted by a suitably trained employee or an individual from an independent testing agency. Individuals being tested may request the presence of an on-site work colleague.

All test equipment will be maintained and used in accordance with the manufacturer's instructions, Australian Standards and any relevant statutory requirements.

Adulterated Samples

Any demonstrated actual or attempted falsification, adulteration or other interference with a drug test samples will be treated as a Non-Negative Test result and may be subject to disciplinary action in accordance with IGO Counselling and Disciplinary Procedure.

Where a sample, when collected, appears to be diluted in colour, fails a creatinine test or the temperature of the sample is not within the specified range (e.g. urine samples between 33 – 38 degrees within four minutes of sample being taken), the employee will be required to provide a second sample. Such a sample will not be immediately treated as an adulterated sample but as a failure to supply an adequate sample and the employee will be required to provide another sample. Subsequent to supplying a second sample, both samples will be further tested and the differences between the two samples will be investigated. If there is evidence of sample adulteration, then disciplinary action will be pursued in accordance with the IGO Counselling and Disciplinary Procedure.

13.4 Refusal to provide a sample

Employees will be allowed a testing time frame of 2 hours from time of primary test sample request to provide a sample. Failure to provide an adequate primary test sample within the time frame will be deemed as a Non-Negative Test result.

Similarly, refusal to provide a test sample upon request will be deemed as a Non-Negative Test.

All individuals having a Non-Negative Test result will be subject to IGO's Counselling and Discipline Procedure, or that of their employer where they are a contractor. In the case of a visitor, they will be asked to leave site.

13.5 Limits

Employees will be subjected to alcohol testing, and drug screening for a range of substances in accordance with the limits defined in:

- AS/NZS 4308:2008 Procedures for the collection, detection and quantitation of drugs of abuse in urine; and
- AS3547:1997 Breath alcohol testing devices for employee use.

Alcohol

IGO has a Blood Alcohol Concentration (BAC%) limit of 0.00¹ as measured by breath testing. For the purpose of testing, any BAC% result above zero (0) will be referred for confirmatory testing.

As far as is practical, a confirmatory test will be conducted within 20 minutes of the initial test. Until the second test is conducted, the individual will not be permitted to ingest food, drink or any other substance. If the confirmatory test result is above 0.00 BAC%, this will be taken to indicate a positive result for the presence blood alcohol.

Drugs

For the purpose of an immunoassay or urine test, a specimen with a result equal to or greater than the initial test cut-off values (Table 1) will be referred for confirmatory testing.

Table 1. Cut off levels as per AS4308:2008

Class of drug	Cut-off level (µg/L)
Opiates	300
Sympathomimetic amines	200
Cannabis metabolites	50
Cocaine metabolites	300
Benzodiazepines	300

Results from the confirmatory test will be reported as ‘detected’ i.e. positive if the concentration levels detected are higher than Table 2.

Table 2. Cut off levels as per AS4308:2008

Compound	Cut-off level (µg/L)
Morphine	300
Codeine	300
6-Acetylmorphine	10
Amphetamine	150
Methylamphetamine	150
Methylenedioxyamphetamine	150
Methylenedioxyamphetamin	150
Benzylpiperazine	500
Phentermine	500
Ephedrine	500
Pseudoephedrine	500
11-nor- 9-tetrahydrocannabinol-9-carboxylic acid	15
Benzoylcgonine	150

¹ A BAC reading of 0.002% or less is considered to be a reading of 0.00%.

Ecgonine methyl ester	150
Diazepam	200
Nordiazepam	200
Oxazepam	200
Temazepam	200
Diazepam	100
Nordiazepam	100
7-amino-clonazepam	100
7-amino-flunitrazepam	100
7-amino-nitrazepam	100

Confirmatory test results equal to, or exceeding the prescribed levels listed above are deemed to be positive to the presence of alcohol or drugs.

The tables above do not provide a comprehensive list of all illegal drugs, nor prescription drugs that may be used illegally. Consequently, where no cut off level is provided in one of the above tables, IGO will seek third party advice on an appropriate cut off level.

13.6 Prescription Medication & Non-Prescription Medication

Some medication may produce a non-negative test result. It is incumbent of the employee / contractor being tested to inform the employee / contractor completing testing if they've used medication prior to the test being completed.

13.7 Test Results

Negative results

Where a negative test result is produced (i.e. no drugs or alcohol is detected) by the primary test the individual will be returned to work.

Non-negative test result consistent with stated medication

- (a) Where a Non-Negative Test in the **primary test** reading is obtained for an Illicit/Synthetic Substance and Prescription Medications or Non-Prescription Medications have been declared prior to the primary test, and the result is believed to be consistent with stated medication, the individual will be returned to work. The **primary test** sample will then be sent for further testing to confirm the result.
- (b) Where a Non-Negative Test primary test reading is obtained and Prescription Medication or Non-Prescription Medication have been declared prior to the primary test and the testing result is believed to be inconsistent with stated medication, the individual will be stood down from work with pay. The primary sample will be sent for further testing. If the result confirms consistency with the stated medication the individual will be returned to work.
- (c) Where a Non-Negative Test primary test reading is obtained, and prior to the test no Prescription Medication or Non-Prescription Medication had been declared, but subsequent to the test is declared, the individual will be stood down from work with pay. The primary sample will be sent for further testing. If the result confirms consistency with the stated medication the individual will be returned to work.

Positive test results associated with alcohol and illicit drugs

Where confirmatory testing demonstrates that an employee has or had drugs or alcohol in their system at the time of testing, the individual will be “stood down” pending the completion of investigation processes associated with IGO’s Counselling and Discipline Procedure, or that of their employer where they are a contractor. In the case of a visitor, they will be asked to leave site.

Non-Negative sample to Illicit Substances or alcohol

An employee who registers a confirmed positive result for any fitness for work test will be subject to either IGO’s Counselling and Discipline Procedure, or that of their employer where they are a contractor. In the case of a visitor, they will be asked to leave site.

Suspected abuse of Prescription Medication or Non-Prescription Medication

If for any reason it is suspected that there is misuse of Non-Prescription Medication or Prescription Medication, IGO may request from the employee’s Medical Practitioner the following details:

- the medication name;
- the medical condition that the medication is required to treat;
- the required frequency and dosage of the medication; and
- the anticipated duration of treatment.

Obtaining the information above for reference will be the responsibility of the employee upon request from IGO.

Alternate duties while on Prescription Medication or Non-Prescription Medication

Alternate duties, if appropriate (they have been approved by a Company medical practitioner) and available, may be provided to an employee who has restrictions on performing their normal duties due to the use of Prescription Medication or Non-Prescription Medications. In the event that alternative duties are not available, the employee will be requested to take Personal (sick) leave.

13.8 Additional notes on managing an individual with confirmed positive alcohol test

The person completing the test will immediately:

- notify the person’s Supervisor and in the case of a contractor or visitor, the authorised site contact, or designated Contract Manager;
- the individual will be declared unfit for work, transport will be arranged back to their accommodation and the person will not be paid for that shift / day;
- the individual will be required to complete an alcohol/drug test prior to recommencing on the next shift / day and attend a meeting with their Supervisor where the individual will be advised of EAP assistance;
- The immediate manager will confirm the positive result in writing and disciplinary action will be taken on a case by case basis. A monitoring program may be implemented upon the individuals return to work;
- Individuals will not be allowed back on site unless the Supervisor is satisfied the individual is fit for work.

13.9 Sale or supply of alcohol or drugs

Any employee found to be involved in the use, sale or supply of alcohol or drugs in the workplace may be subject to disciplinary action in accordance IGO's Counselling and Discipline Procedure, or that of their employer where they are a contractor. In the case of a visitor, they will be asked to leave site.

13.10 Management of Individuals with ongoing Fitness for Work Issues

To ensure individuals with ongoing fit for work issues are managed appropriately and that the requirements of this Standard are met, IGO will implement the following process:

- As soon as they become aware, Supervisors will confidentially discuss any evident or suspected Fitness for Work problem with the individual concerned. IGO will allow such individuals to be accompanied at any such discussion by a work colleague or other appropriate support employee at their request;
- Supervisors will refer employees for appropriate medical (or other professional assessment) where there may be medical / other factors impairing an individual's fitness for work. In such cases, IGO will require proof acceptable to its accredited medical provider (or other specialist provider) that the problem has been satisfactorily resolved prior to the individual returning to work;
- IGO requires employees with Fitness For Work issues/matters to provide satisfactory evidence that the issues have been addressed before they are permitted to return to work;
- Supervisors will ensure that employees with Fitness For Work issues are held accountable through the usual performance management processes to demonstrate a clear and consistent improvement in their job performance;
- Following a confirmed breach of the Fitness for Work and Wellbeing Standard, IGO will allow access to sick leave and then accrued annual leave during the period that an employee is unable to demonstrate they are fit for work.
- Any absenteeism issue will be handled in accordance with the IGO Counselling and Discipline Procedure.

14. APPENDIX 3: RECORD MANAGEMENT

All Fit for Work assessments and/or testing will be documented to ensure the individual, the tester and IGO are protected with respect to their civil and legal rights.

The forms for Fitness for Work testing can be found on the IGO intranet site.

IGO will ensure all relevant information is safeguarded and managed according to requirements for the management of confidential medical information. Such information will only be provided on a need to know basis, subject to legal / legislative requirements.

IGO and its agents must ensure:

- the confidential transmission and reception of Fitness for Work information
- transmitted information is clearly endorsed as 'confidential' and 'for employee attention' of the addressee
- electronic storage of Fitness for Work information is secure