

Policy

Title: **Fitness For Work**

Doc No: **P301.067** Issue: **1** Revision: **11** Date Last Updated: **06/02/2026**

Department: Health Safety Environment & Comms
Section: Occupational Health
Category: Human Resources
Owner's Role: Manager - Health Safety Environment & Comms
Approver's Role: General Manager

CONTENTS

1.0	PURPOSE	2
2.0	SCOPE	2
3.0	RESPONSIBILITIES	2
3.1	Supervision	2
3.2	All Employees	2
4.0	POLICY	2
4.1	Pre-Employment Medicals	2
4.2	Pre-Employment Aptitude and Behavioural Assessments	2
4.3	Internal Transfer Medicals	2
4.4	Internal Promotions	3
4.5	Health Assistance	3
4.6	Health Monitoring	3
4.7	Hearing Conservation	3
4.8	Rehabilitation	3
4.9	Drugs and/or Alcohol	3
4.10	Medical Conditions	3
4.11	Daily Hours of Work	3
4.12	Continuous Shifts Worked	4
4.13	Education and Training Programs	4
5.0	ATTACHMENTS	5
5.1	<i>Roster risk assessment</i>	5
6.0	REFERENCES	5
6.1	QAL Documents	5
6.2	Associated ARCHER Risk Scenarios	5
6.3	External References	5
7.0	DEFINITIONS	5
8.0	REVISION DETAILS	5
8.1	Latest Document Review Participants	5
8.2	Revision History	6

1.0 PURPOSE

To ensure that all the employees are fit for work by supplying a safe working environment and by providing assistance through a full range of preventative, educational and rehabilitative measures to overcome problems which could impair an individual's fitness for work.

2.0 SCOPE

This policy applies to all QAL employees.

All persons including Contractors and Visitors entering the QAL site will be subject to the policy on drugs and alcohol detailed in 4.8 and hours of work in 4.10 and 4.11.

3.0 RESPONSIBILITIES

3.1 Supervision

Responsible for providing a safe and healthy working environment for employees and assessing if any of their team members are not fit for work at the start of a shift due to the influence of alcohol or other drugs or any other physical or mental condition.

3.2 All Employees

Responsible to not wilfully place at risk the health and safety of any person in the workplace.

Responsible to be ready, willing and able to perform the work of their role.

Responsible for making their Supervisor/Team Leader aware of any fitness for work issues at the start of a shift.

Responsible for conforming to Company policies and procedures.

4.0 POLICY

QAL's policy on "fitness for work" is outlined in P001.001. It states QAL will "provide systems to ensure "fitness for work", identifying and addressing occupational health risks, creating a healthier work environment". Systems that support this policy are described below.

4.1 Pre-Employment Medicals

Pre-employment medicals shall be conducted in accordance with Procedure P315.205.

4.2 Pre-Employment Aptitude and Behavioural Assessments

Pre-employment aptitude and behavioural assessments shall be conducted in accordance with Paragraph 4.7 of Policy P301.016.

The results of the pre-employment aptitude and behavioural assessments shall be confidential to the prospective employee, the consultant assisting with the assessment, and the Company.

4.3 Internal Transfer Medicals

A medical assessment is arranged by Human Resources for any employee who changes to substantially different role. Examples are:

- Staff to AP
- Electrician to Operator
- Operator to Machinery Operator
- where the tasks performed require different physical activities.

Employees must also undertake a medical where specifically requested by the Occupational Health Centre or if they have not had a medical assessment performed in the last 12 months.

Any person moving into a crane driver position or Raw Materials must undertake a specific medical as per fitness to drive guidelines.

HR Recruitment are required to check with the Medical Centre prior to all other transfers/promotions/permanent appointments, including short-term transfers, to ensure that employees are fit to undertake the role.

4.4 Internal Promotions

Employees being considered for promotion to a higher stratum level may be required to participate in an employment aptitude and behavioural assessment.

The results of the aptitude and behavioural assessments shall be confidential to the employee, the consultant assisting with the assessment, and the Company.

4.5 Health Assistance

The Company shall encourage all employees to obtain appropriate health care by assisting employees with access to private health insurance as per Procedure P301.029.

4.6 Health Monitoring

The Company shall provide health monitoring as per Procedure P315.205.

4.7 Hearing Conservation

The Company shall have a Hearing Conservation Program detailed in Procedure P315.201.

4.8 Rehabilitation

The Company shall encourage rehabilitation of any employee who suffers impairment of their ability to perform the work of their role.

Rehabilitation shall be in accordance with Policy P001.007 and Procedure P315.208.

4.9 Drugs and/or Alcohol

The Company shall have an Alcohol and other Drugs Policy detailed in Policy P001.013 and a Drug and Alcohol Screening Procedure detailed in P302.019.

4.10 Medical Conditions

- 4.10.1 It is recognised that employees may have, or develop, medical conditions either temporary or chronic (long term) that may impair a person in the performance of their normal duties.
- 4.10.2 Employees have an obligation to notify their Supervisor/Team Leader of any fitness for work issues at the start of a shift.
- 4.10.3 Any employee with a medical condition as described in paragraph 6.3.1 shall be offered assistance/rehabilitation in accordance with Procedure P315.208.
- 4.10.4 Any employee who is using medication that may impair them in the **safe** performance of their normal duties, shall report to the **Occupational Health Centre** prior to commencing work. The **Occupational Health Nurse or attending doctor** shall determine their fitness for work and determine any work limitations **are required**. The employee and the Occupational Health **Centre staff** shall **communicate** any work limitations **that may be required** to the employee's direct supervisor.

4.11 Daily Hours of Work

- 4.11.1 The site access system-**(Gallagher, formerly CARDAX) is configured to automatically send an email to Plant Protection on an hourly basis, with the details of any person who has been on site in excess of 12.5 hours from time of initial entry into the plant in any 24-hour period.**
- 4.11.2 On receipt of an email from **site access system**, the receiving Plant Protection Officer shall notify the person's supervisor, or the person in control of the person who has been on site in excess of **12.5 hours**, of the details supplied by **site access system**. This notification shall be by telephone where possible, and by email where it is not possible to contact the relevant supervisor or person by telephone. If email is used, it shall be supported by attempts at telephone contact until an acknowledgement is received.
- 4.11.3 On receipt of the notification from the supervisor or the person in control of the person who has been on site in excess of **12.5 hours**, **must**:
 1. **Investigate whether an approved S-159 - Individual Fatigue Management Plan is in place. If that is not in place a SAP incident is to be raised with the aim of identifying the cause and implementing appropriate controls to prevent a recurrence.**

2. Ensure that the task being performed by the person is risk assessed to ascertain whether there are any hazards associated with a person working extended hours and implement appropriate controls which may include but not be limited to:
 - contingency plan for resourcing if the task extends further than expected
 - decision-making support where the potential decisions to be made by the person may have significant negative consequences.
3. Assess the fitness of the person to perform the task and assess any hazards that may be encountered as a result of working extended hours and implement appropriate controls which may include but not be limited to.
 - additional supervision/support
 - appropriate rest breaks
 - appropriate sustenance
4. Offer transport home to the person (at the employer's expense) at the conclusion of the person's work.

Shifts exceeding 12.5 hours require prior approval using S-159 - Individual Fatigue Management Plan. Shifts must not be planned to exceed 12.5 hours. Over 14 hours in a 24- hour period is Not permitted.

- 4.11.4 ***Alternative rosters for project and shutdown work may differ from standard shift rosters. Where rosters are different from current QAL shift rosters, a S-193 – Alternative Roster Fatigue Management Approval Form must be completed and submitted to the Area Superintendent for review and approval.***

Where an extension of a shift or alternative roster has been approved, a copy of the approval must be emailed to PlantProtection@qal.com.au to prevent unnecessary notifications to Leaders.

4.12 Continuous Shifts Worked

An approved S-159 - Individual Fatigue Management Plan is required when planning to work between 56 to 72 hours over a continuous 7-day period.

The General Managers approval is required on the S-159 - Individual Fatigue Management Plan when planning to work more than 72 hours over a continuous 7-day period.

- 4.12.1 The ***site access system*** shall be configured to automatically email to Plant Protection on an hourly basis, the details of any individual who has been on site in excess of 6 ***hours over a continuous 7-day period.***
- 4.12.2 On receipt of an email from ***site access system***, the receiving Plant Protection Officer shall notify the individual's supervisor, or the person in control of the individual, of details supplied by ***site access system***. This notification shall be by telephone where possible, and by email where it is not possible to contact the relevant supervisor or person by telephone. If email is used, it shall be supported by attempts at telephone contact until an acknowledgement is received.

On receipt of the notification, the supervisor or the person in control of the individual shall ***investigate whether an approved S-159 - Individual Fatigue Management Plan is in place. If that is not in place an SAP incident is to be raised with the aim of identifying the cause and implementing appropriate controls to prevent a recurrence.***

4.13 Education and Training Programs

- 4.13.1 The Fitness for Work policy shall be supported by information, education and training programs.
- 4.13.2 Information, education and training programs shall raise employee awareness of significant fitness for work issues (including fatigue, stress and the inappropriate use of alcohol and drugs) and available assistance programs.
- 4.13.3 Managers, supervisors and other appropriate staff shall receive appropriate training in the recognition, management and referral for assistance of any concerns relating to fitness for work

5.0 ATTACHMENTS

5.1 Roster risk assessment

6.0 REFERENCES

6.1 QAL Documents

- P001.001 - QAL Health Safety Environment and Communities Policy
- P001.007 - Rehabilitation Policy
- P001.013 - Alcohol and Other Drugs
- P301.016 - Recruitment and Selection
- P301.029 - Management Health Care Assistance
- P302.019 - Alcohol and Other Drug Screening
- P302.029 - Fatigue Management
- P312.501 - Injury and Illness Management
- P315.201 - Noise Management Program
- P315.205 - Health Monitoring
- P315.208 – Rehabilitation

- S-159 - Individual Fatigue Management Plan**
- S-193 - Roster Fatigue Management Approval Form**

6.2 Associated ARCHER Risk Scenarios

Nil

6.3 External References

- Queensland Workplace Health & Safety Act
- Fair Work Act**
- Federal Disability Discrimination Act
- Queensland Anti-Discrimination Act
- Human Rights and Equal Opportunity Act
- Criminal Law Rehabilitation of Offenders (Act) (Qld)

7.0 DEFINITIONS

“Fitness for Work” means that an individual is in a state (physical and mental) that enables the employee to perform all assigned tasks competently and, in a manner, which does not compromise or threaten the safety or health of themselves or others or threaten damage to plant or equipment or the environment.

Safety critical jobs are those jobs where incidents or lack of fitness for work, are likely to result in serious injury, illness, a fatality, significant environmental impact or plant damage.

8.0 REVISION DETAILS

8.1 Latest Document Review Participants

Name	Role Title	Contribution <i>Technical/Subject Matter Expert, End User, Owner etc</i>
Di Staats	Specialist – Occupational Health	Technical expert
Troy Tolhurst	Supervisor – Plant Protection and FRT	Technical expert

8.2 Revision History

Iss	Rev	Date	Lead Reviewer	Details of Change	Approver Role	Approver Name
1	8	03/04/2020	Di Staats	Additional information added to 7.0 Definitions regarding Safety Critical Jobs	General Manager	Pine Pienaar
1	9	16/05/2023	Christian Barnard	Updated wording in Section 4.10.4 to clarify reporting and management of medications in the context of fitness and safety for work and ensure alignment with the Alcohol and Other Drugs Policy (P001.013)	General Manager	Pine Pienaar
1	10	11/12/2024	Di Staats	Updated roles to reflect current organisation structure. Updated from Cardax to site access system	General Manager	Trent Scherer
1	11	06/02/2026	Craig Sinclair	Revised to align with amendments made to P302.029 - Fatigue Management, S-159 Individual, and S-193 Roster. As agreed to by Aaron Farrar, Di Staats, and Deb Steel. Clarity on excess hours, Roster risk assessment, and Individual Fatigue Management Plan.	General Manager	Trent Scherer

Attachment 5.1 – Roster Risk Assessment

Purpose: To ensure appropriate fatigue management by providing guidance on work hours and consecutive shifts.

Risk	Work Hours or Consecutive Shifts	Action
Low	<ul style="list-style-type: none"> • 12.5 hours or less in 24 hour period (including handovers) • Up to 56 hours in a 7-day period • 6 consecutive day shifts or less • 4 consecutive night shifts or less 	Self-monitor – ensure alertness doesn't decrease
Medium	<ul style="list-style-type: none"> • More than 12.5 hours in 24-hour period (incl. handovers) • Between 56 – 72 hours in a 7-day period • More than 5 consecutive night shifts 	Stop work and notify leader - Complete management plan. All orange boxes are mandatory controls at a minimum. Please provide details of evidence.
High	<ul style="list-style-type: none"> • More than 72 hours in a 7-day period • Less than 10 hours break between shifts • Less than 1 work free day in a 7-day period 	Stop work and notify leader - Complete management plan. All orange boxes are mandatory controls at a minimum. Please provide details of evidence.