



CODE OF PRACTICE

Mentally healthy workplaces for fly-in fly-out (FIFO) workers in the resources and construction sectors

PUBLIC CONSULTATION SUBMISSION

The Department of Mines, Industry Regulation and Safety (DMIRS) has prepared a draft code of practice for mentally healthy workplaces for fly-in fly-out (FIFO) workers in the resources and construction sectors in Western Australia. The development of this code was in response to the recommendations and findings of the Legislative Assembly Education and Health Standing Committee final report on the impact of fly-in, fly-out (FIFO) work practices on mental health, which was tabled on 18 June 2015.

The Department is welcoming comments and feedback on the draft guideline until the **19th of April 2018**.

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Please indicate if you would like your organisation to:

- Remain anonymous
- Be published alongside your submission in the supporting documents for the final code of practice

ABOUT SIOPA

The Psychology Board of Australia provides endorsement across nine (9) areas of expertise in psychology – Clinical Neuropsychology, Clinical Psychology, Community Psychology, Counselling Psychology, Educational and Developmental Psychology, Forensic Psychology, Health Psychology, Organisational Psychology, and Sport Psychology. SIOPA represents Organisational Psychologists and practitioners working in the expert field of Organisational Psychology.

Founded in November 2016, the Society for Industrial and Organisational Psychology Australia (SIOPA) is an independent and incorporated association with a purpose to create growth, supervision and professional development opportunities for Organisational Psychologists and related disciplines in Australia. Our practices, methods and principles have been derived and supported by US based SIOP and are tailored to suit the renewed challenges that present our profession moving into the future in Australia.

Among their many areas of practice, Organisational Psychologists may work in workplace rehabilitation, occupational health and safety and wellbeing, stress and work-life balance. Organisational Psychologists' expertise and knowledge of individual, group and organisational factors allow them to more accurately identify the root cause of an issue, and thus develop an effective intervention. Therefore, it is appropriate for SIOPA to submit a response regarding the draft code of practice.

FOCUS AND FORMAT OF SUBMISSION

SIOPA appreciates the opportunity to comment on the draft code of practice for mentally healthy workplaces for fly-in fly-out (FIFO) workers in the resources and construction sectors in Western Australia.

SIOPA's submission to this review will provide the unique viewpoint from Organisational Psychologist's perspectives in terms of mentally healthy workplaces and the role of the employer. This submission will address some of the key sections raised in the draft code of practice with a focus on the prevention of work-related mental ill health. We will refer to the page number for the specific section we intend to address.

SUBMISSION

PAGE 14. TABLE 4.1 WORK-RELATED PSYCHOSOCIAL HAZARDS AND FACTORS.

ADDITIONAL CONSIDERATIONS FOR FIFO WORK ARRANGEMENTS

SIOPA recognises that the shading in Table 4.1 indicates descriptions or examples of psychosocial hazards for which there may be additional considerations for FIFO work arrangements. However, certain hazards or factors have been mentioned multiple times throughout the table and are not

consistently highlighted. To ensure consistency of the table, SIOPA propose that the following hazards or factors are also highlighted:

- “sustained concentration” as examples under Work Demands and Fatigue
- “length of work shift” as an example under Poor Physical Health as well as “extended work hours” as an example under Fatigue.

ADDITIONAL HAZARDS AND FACTORS

SIOPA supports the comprehensive list of psychosocial hazards and factors, including those that require additional considerations for FIFO work arrangements. SIOPA notes that Table 1.1 makes reference to the interplay of individual and workplace factors that may affect an employee’s mental health. However, there is a likelihood that individuals may present at work with mental ill health developed outside of the workplace. SIOPA encourages DMIRS to consider the presence of individuals with mental ill health as an additional psychosocial hazard or factor to ensure that appropriate controls are implemented.

SIOPA acknowledges that the draft code of conduct identifies that the legislative definition of “workplace” differs and that currently it considers the “workplace” in the context of “physical location”. As the code of practice specifically relates to FIFO work arrangements, SIOPA suggests that employer responsibility extends beyond the physical location where an individual works to include air travel, employer-provided camps, share house environments or employer-funded regional town accommodation whilst undertaking their FIFO work. SIOPA recommends the addition of hazards and factors specific to employer-provided accommodation, particularly as there is precedent of accepting claims under the Workers Compensation and Injury Management Act 1981. Example hazards and factors include physical injury, sexual assault, domestic violence, alcohol abuse, bullying and aggression.

PAGE 18. RISK ANALYSIS AND RISK ASSESSMENT

SIOPA supports the information provided in this section, including what the process involves and who should be involved.

PAGE 19-20. CONTROLLING THE RISKS

SIOPA supports the identification of strategies for controlling identified risks, including acknowledgment of the varying effectiveness of such strategies. However, as a code of practice is developed as a practical guide to achieve the standards of occupational safety and health under legislation, SIOPA recommends that this section is elaborated.

SECOND PARAGRAPH

There appears to be a word missing in the first sentence. SIOPA proposes that the sentence should read, “Some psychosocial hazards and factors relate to the job as a whole...”.

TABLE 6.1 STRATEGIES FOR CREATING MENTALLY HEALTHY WORKPLACES

SIOPA identifies that a number of terms listed throughout Table 6.1 are open to interpretation, where there is no reference or benchmark to determine the optimum level of the control. Examples include:

- “... so far as is reasonably practicable.”
- “appropriate workload”
- “good job design”
- “reasonable work adjustments”

Similarly, SIOPA identifies that a number of concepts listed throughout Table 6.1 may require supporting definitions or descriptions if they are to be included. Examples include:

- “appropriate workload”
- “good job design”
- “reasonable work adjustments”
- “...persons are missing from work”

To increase the practicality of the code of practice as a standalone guide and to reduce the ambiguity of certain terms, SIOPA suggests that Table 6.1 is further elaborated to reflect a similar level of detail that is included in Table 4.1. For example, Section 1 of Table 6.1 could be formatted as:

Control	Description	Examples
1. Prevention (primary): Eliminate exposure to psychosocial hazards, so far as is reasonably practicable		
Promoting a positive workplace culture	Promoting a workplace culture that is inclusive, destigmatises mental health problems and encourages help-seeking	• Example
Developing and implementing policies and procedures incorporating mental health	Developing a policy to ensure that treatment and care is delivered to those in need and pre-formulating procedures to implement the vision and objectives defined in the policy	• Example
Appropriate workload	The amount of workload the employee has to complete, including timelines for completing work ¹ , is achievable with reference to their capacity for work as well as knowledge, skills and abilities	• Example

¹ Department of Commerce, www.commerce.wa.gov.au

Good job design	Healthy and safe work where human performance, job satisfaction and productivity are optimised and the hazards and risks are eliminated or minimised ²	<ul style="list-style-type: none"> • Example
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ADDITIONAL CONTROLS

Similar to the argument above regarding additional hazards and factors, SIOPA recommends the addition of controls specific to employer-provided accommodation. Example controls include mental health preventative measures (e.g. on-site psychologists, Chaplains, wellbeing coordinators) and activities that are not purely physical that have a clear focus on broader wellbeing (e.g. yoga, meditation groups, hobby clubs, movie nights).

IMPLEMENTATION OF CONTROLS

As outlined on page 4 of the draft code of practice, those who have functions or responsibilities to manage exposure to psychosocial hazards and factors in the workplace should use the code of practice. However, to ensure employee safety and appropriate implementation of controls, many of the suggested controls will require delivery from – or at a minimum, consultation with – specialist Human Resource personnel or mental health professionals. Examples of such controls include Employee Assistance Programs (EAP), education and training, peer support programs, emergency response and crisis management plans and return-to-work programs. SIOPA recommends that the code of practice provides further detail regarding recommendations for service delivery.

WORKER OWNERSHIP

SIOPA acknowledges the note on page 18 that encourages worker ownership throughout the process to increase support and understanding. SIOPA recommends that this is further elaborated in section 5 to detail the role of the employee in the successful implementation of controls.

² Safe Work Australia, www.safeworkaustralia.gov.au
Principles of good work design: A work health and safety handbook

GENERAL COMMENTS

EMPLOYER RESPONSIBILITY

As is mentioned throughout the submission, SIOPA suggests that employer responsibility extends beyond the physical location where an individual works to include air travel, employer-provided camps, share house environments or employer-funded regional town accommodation whilst undertaking their FIFO work. Therefore, employers require a concise code of practice to understand and abide by and to assist in providing a standardised level of responsibility to recognise what constitutes mentally healthy duty of care for FIFO workers on and off roster. SIOPA recommends that employer responsibility, as well as potential limits or boundaries to duty of care, are addressed in greater detail throughout the code of practice.

CASE STUDIES AND EXAMPLES

SIOPA recognises that the draft code of practice has been developed in response to the 2015 report from the Legislative Assembly Education and Health Standing Committee and that additional information is likely to be collected over time with regards to the effective use of the code of practice. SIOPA recommends that as organisations demonstrate the effective use of the code of practice, DMIRS includes case studies and real-life examples of the organisations having conducted a risk management approach for mental health and wellbeing. This is likely to assist other organisations in adopting the code of practice for their organisation.

SIOPA suggests that DMIRS may already have access to this type of information following the February-October 2016 psychosocial harm audits of mining operations, and petroleum and major hazard facilities³.

VARIED LANGUAGE

SIOPA identified variations in the use of language when referencing mental ill health, including “mental ill health”, “mental health problems” and “mental illness”. Whilst there is argument to suggest that there is a difference in the meaning of the variants, they appear to be used interchangeably throughout the draft code of practice. SIOPA recommends using consistent language when referencing mental ill health or providing definitions for the variants.

³ Department of Mines and Petroleum, <http://www.dmp.wa.gov.au>

Baseline results for psychosocial harm audits of mining operations, and petroleum and major hazard facilities