



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. This draft code was developed 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.

Following a first round of public consultation on the draft code of practice from 16 February to 19 April 2018, the Department has responded to feedback and now seeks comment on the revised draft code of practice. Submissions close 5.00 pm WST, 21 September 2018.

Please use this cover sheet and feedback template to submit your comments to safetycomms@dmirs.wa.gov.au

Suggested content changes may also be tracked on the Word document and submitted together with this completed template.

Section 1: Submission details

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Internet publication

Public submissions may be published in full on the website, including any personal information of authors and/or other third parties in **contained in the submission**.

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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



SIOPA 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.

Section 2: Feedback

Track-changed document submission

Does this submission contain a **track-changed version** of the draft code?

Yes

No

If yes, submit as a Microsoft Word compatible document (.docx)*

General comments

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 recognises that whilst not appropriate within the main body of the code of practice, DMIRS should provide case studies and real-life examples of 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. It may also assist organisations issued with improvement notices to better understand how to remedy the things or operations causing the contravention or likely contravention.

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 facilities¹.

VARIED LANGUAGE

SIOPA identified variations in the use of language when referencing mental ill health, including “mental ill health” and “mental health problems”. 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.

APPENDICES AND EXTERNAL LINKS

SIOPA suggests the appendices, particularly Appendices 3 to 12, may be better suited to a website to enable it to be updated regularly. Broken links becomes an issue when external URLs are included and there is no quality control, for example, external providers can change a webpage to include content with no vetting for quality of information. End users might not be aware and may adopt something that is not best practice. Whilst this is recognised as a worst case scenario, DMIRS have little control over some of the websites and documents referenced. SIOPA acknowledges the Disclaimer stating the State shall in no way be liable, however a website might also minimise risk in this instance.

Detailed comments

¹ 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

If commenting on specific content, you may wish to use the table below.

Reference to specific chapter/section/page	Comment
Page 3-4	<p>SIOPA acknowledges that the draft code of practice identifies that the legislative definition of “workplace” differs and that currently it considers the “workplace” in the context of “physical location”. Whilst physical injury is often easily identified as occurring in a particular physical location, the causes of mental ill health and longer-term physical injury (e.g. exposure to UV radiation) can be less easily identifiable. This is often because there are many different factors contributing to the development of each illness, hence it can be difficult to predict how or when the injury was caused, likely to extend beyond the traditional definition of what is considered the “workplace”. As the code of practice specifically relates to FIFO work arrangements, including psychosocial risks and hazards associated with the 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 also 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.</p> <p>SIOPA recognises the code of practice made a brief mention of other residential and long-distance commuting (e.g. drive-in drive-out work arrangements specifically related to exploration, construction, mining or processing. SIOPA suggests there are other industries, for example, commercial fishing where people are working away from home, and may benefit from the code of practice. Considering the purpose of the code of practice, SIOPA encourages the code of practice to further elaborate the definition of FIFO and other long-distance commuting, as well as consider its application for other industries.</p>
Page 20, Table 6.1	<p>SIOPA supports the elaborated examples of controls as detailed in Table 6.1. In the original draft code of practice, a number of terms listed throughout the table were brief statements left open to interpretation, where there was no reference or benchmark to determine the optimum level of the control.</p> <p>In acknowledging the impracticality of the code of practice being a standalone guide, SIOPA also supports the addition of Appendices 3 to 12 that describe guidance and research findings that may assist with implementing risk management for psychosocial hazards and risk factors. This will assist in defining a number of terms and concepts that may not be common knowledge and will reduce the ambiguity of certain terms (e.g. good job design).</p>

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SIOPA is in agreement with the examples of activities to support effective communication and consultation, however they are all examples of broader level activities targeted at the group, team or organisational level. There is a lot to be said for individual discussions (e.g. performance reviews, one-on-one meetings) which tend to benefit morale, motivation and communication. Incorporating safety and health matters in all communication, including one-on-one meetings, will personalise the risk management approach for individuals, leading to increased support and understanding.

-END OF SUBMISSION-