

A. MANAGEMENT SYSTEMS STANDARDS

A5. OCCUPATIONAL MEDICAL SURVEILLANCE

1.0 Scope

Medical surveillance in these Standards is restricted to the detection of conditions caused by workplace conditions, or conditions that might be risk factors for poor adaptation to work conditions, and applies to employees and Category 1 contractors only. The use of medical examinations for improving general health or for healthier lifestyle promotion, although valid reasons for periodic medical examination, is not covered in this Standard.

2.0 Programme Design

- 2.1 The medical surveillance programme must be consistent with local regulatory requirements, site health risks and be linked to the facility's objectives and targets. It must be based on workplace monitoring and assessment. Where a possible health risk is identified, workers must be encouraged to participate in the medical surveillance programme.
- 2.2 The medical surveillance programme must be based on sound ethical and clinical practice, such that:
- (a) Worker's privacy and confidentiality of individual health information is maintained;
 - (b) Test equipment is adequate and appropriate for identified health hazards, and written protocols, including quality control requirements, are available;
 - (c) Biological monitoring methods are appropriate;
 - (d) There are documented medical standards for all safety critical jobs;
 - (e) There are documented methods, standards or guidelines available for determining illness progression resulting from workplace exposures;
 - (f) There are guidelines available for determining removal and re-entry levels for priority hazardous substances and agents where required; and
 - (g) Fitness for a particular type of work is determined.
- 2.3 Workers must be informed of the potential risks from tests and of the monitoring results.
- 2.4 A system must be in place to notify appropriate personnel of new employees, those transferring to another job and those leaving the company.
- 2.5 Where legally possible, a system must be in place that encourages employees to report health conditions that could affect their ability to do their job safely, or that might be confounded by job exposures (eg. pregnancy and reproductive health risks).

3.0 Examinations

- 3.1 Medical examinations must be conducted by a physician, nurse or equivalent, as allowed by local law.
- 3.2 A pre-employment or pre-placement examination is required when:
- (a) The proposed job has specific health requirements; OR
 - (b) There is a risk that at current site conditions an adverse health effect could occur; OR
 - (c) There is a legal requirement.
- 3.3 Pre-placement standards for medical examination must be appropriate to the actual, or foreseeable future, risks from the employment or the job assignment.
- 3.4 Any invasive tests must only be undertaken when indicated by the nature of the future job and with the written permission of the candidate. Failure to provide an appropriate sample can be used to make a decision of suitability.
- 3.5 A periodic health surveillance programme is required when either:
- (a) There is a probability that a health effect could occur from conditions on site; and
 - (b) There is a test that can detect that effect reliably; and
 - (c) Detecting the abnormality brings a health benefit to the worker; and
 - (d) The health benefits are greater than any harm from the testing; OR
 - (e) There is a legal requirement for periodic health monitoring.
- 3.6 Particular attention must be given to appropriate medical monitoring for workers where risk assessment indicates the potential for exposure to high-risk hazardous substances including carcinogens, reproductive toxicants or respirable crystalline silica.
- 3.7 The frequency of examinations must be documented and be based on an assessment of the level of health risk, the speed of progression of any illness and on legal requirements.
- 3.8 In some countries, staff with no recognised health qualifications such as foremen, are used in periodic health surveillance. In these cases, the staff must be appropriately trained, be aware of the need to maintain medical confidentiality, and have professional back up for referral of possible problems.
- 3.9 Employees must undergo an examination on resumption of work after a prolonged absence for health reasons.
- 3.10 A medical examination is required on termination of employment, or where this is not legally possible must be offered, when either:
- (a) There is a possibility that health changes could have occurred;
 - (b) There is a need to document the degree of health changes during employment; or
 - (c) There is a legal requirement.

4.0 Biological Testing

- 4.1 Occupational health physicians or medical practitioners must retain overall responsibility for biological tests and other medical investigations.
- 4.2 Biological monitoring must not be a substitute for the monitoring of the working environment and the assessment of individual exposures.
- 4.3 Where legislation or company policy has both a workplace environment standard (OEL), and a biological standard, compliance with both must be achieved. Compliance with one cannot be used to excuse non-compliance with the other.

5.0 Reporting

- 5.1 The prime responsibility of a physician or nurse is to the individual patient. However, additional control of workplace conditions required to improve the health of the worker requires management actions. Where adverse health cases are detected, the physician/nurse must seek the worker's written permission to give sufficient information to the appropriate manager to effect change, without breaking confidentiality conventions. The physician must encourage the employee to give this permission. If this permission is refused, the physician must record this in the individual's notes, and consider, after consultation with plant staff on job requirements or the safety of others, if the potential outcome of continuing exposure is sufficient to warrant removal of the worker from further exposure.
- 5.2 Medical surveillance information must be provided to the Company management in a form that respects the privacy of the individual, but enables the Company to fulfill their duty of care obligations to employees.
- 5.3 Adverse trends in health monitoring results for an area must be reported to the area manager in writing within seven days. The names of individuals may not be disclosed without their written authorisation.