Inquiry into mental illness in fly-in, fly-out workers
Discussion Paper

February 2015

Chamber of Commerce and Industry of Western Australia (Inc)
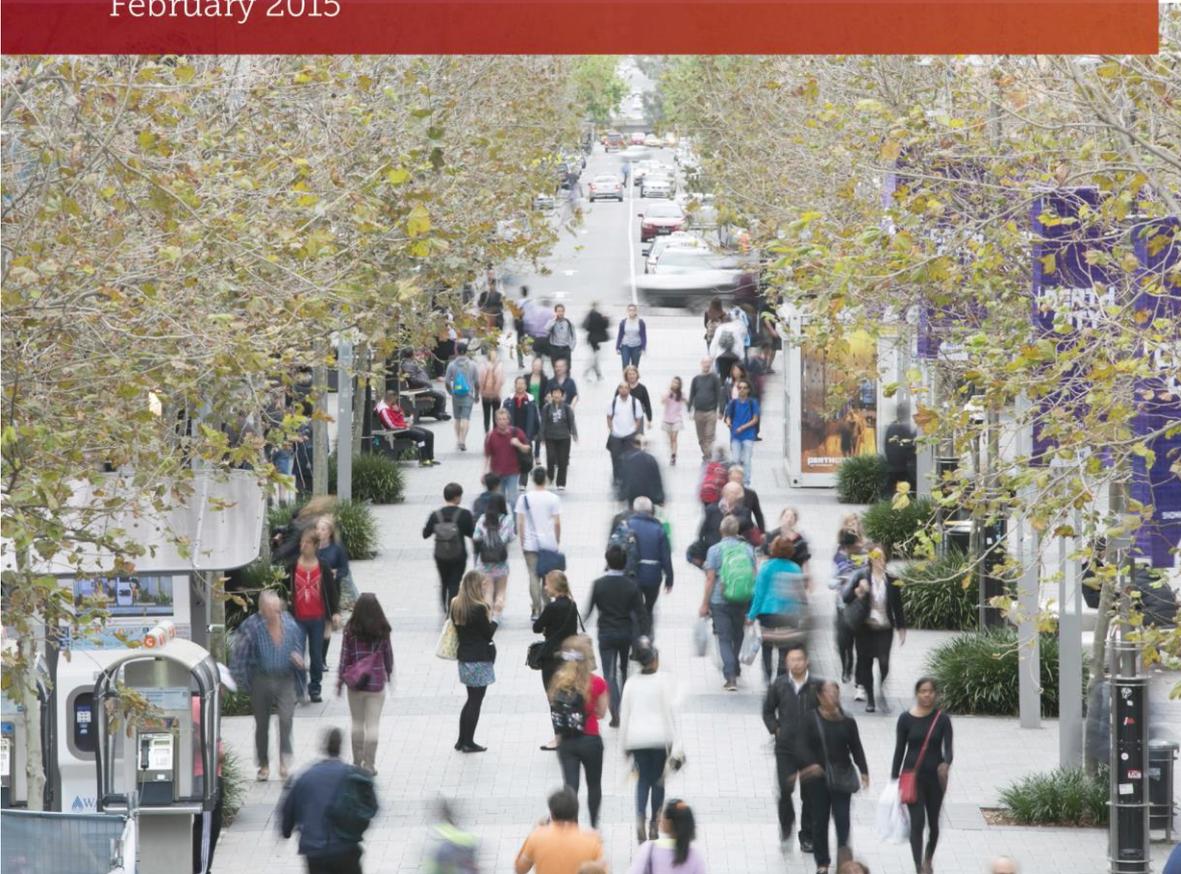
Shining a Light on FIFO Mental Health: A Discussion Paper

The Chamber of Commerce and Industry of Western Australia (CCI) is a not-for-profit, member based organization, providing quality, cost-effective information, services and support for business. Our commitment to helping Australian businesses is summed up in our Vision: To make WA a world leading place to live and do business.

With extensive commercial and government linkages across Australia, CCI is the peak business body for Western Australia. With a reach of over 9,000 members across the state, CCI services the business community by working cooperatively with local chambers of commerce, business associations, economic development councils and Government at all levels. CCI has strong engagement with local businesses, particularly small and medium enterprises (SME) and has more touch points with the business community than any other organisation in the state.

CCI welcomes the opportunity to make a further submission to the Education and Health Standing Committee (the Committee) in relation to the Discussion paper released as part of the Parliamentary Inquiry into the Mental Health of Fly-in Fly-Out (FIFO) workers in Western Australia (the Inquiry).

CCI reiterates the view mental ill-health is an important public health issue. CCI considers the focus of this Inquiry as a missed opportunity to better understand mental health issues across the state's workforce, as employers across all industry sectors are reporting an increase in mental health related matters arising in the workplace.

As previously stated, the capacity of policy makers to properly identify occupation-related health or psychological issues, and the ability of employers to respond appropriately to the needs of their workforce, is limited by an absence of empirical data in relation to the social and emotional wellbeing of workers.

CCI urges the Committee to consider the following:

- That industry, government, mental health experts and other stakeholders work together to continuously improve mental health outcomes;
- The Inquiry and initiatives to address mental health issues should not be limited to FIFO working arrangements but instead should be focussed on reducing the prevalence and effects of mental ill-health and suicide in the community generally;
- Further research and data collection in relation to FIFO suicides is needed as a means of positively informing planned initiatives;
- Support for the planned initiatives of the Mental Health Commission (*Mental Health 2020*) and believes that this would provide a framework and resource network that employers could tap into in order to provide support to their employees;
- Support for government infrastructure initiatives that provide benefits not only to the local economies, but to the general wellbeing of the local communities, businesses and employees within rural and remote regions;
- Every person has the personal choice to remain in a role or seek alternative employment; and
- The current Western Australian occupational safety and health (OSH) legislation and harmonised work health and safety legislation adequately cover psychological health risk control under duty of care and risk management provisions, and should not result in additional prescription.

We welcome the opportunity to participate in further discussion about the complex and multi-faceted elements of FIFO mental health, and workplace mental health more broadly in Western Australia.

Yours sincerely,

John Nicolaou
Chief Officer, Member Services and Advocacy

The workplace and general health concerns

CCI considers mental ill-health to be an important public health issue which impacts not only on the individual, their family and the community, but also on the workplace due to the substantial amount of time spent at work. Cardiovascular disease, cancer and musculoskeletal disease are public health issues that have similar wide-reaching impacts. It is important for workplaces to be equipped to identify risk factors and respond to these within their means and areas of control. It is not appropriate or feasible for employers to take responsibility for the diagnosis, treatment or control of health conditions including mental health conditions.

Safety and health management systems and human resource systems are designed to identify relevant workplace risk factors that can be controlled and addressed with the assistance of practical guides, such as those listed in the table below.

Preventative guide	Risk Factor
Working Hours (Code of Practice, 2006)	Fatigue
Prevention and management of violence, aggression and bullying (Code of Practice, 2007)	Bullying, harassment and violence
Manual tasks (Code of practice, 2010)	Musculoskeletal injury
First aid facilities and services; Workplace amenities and facilities; Personal protective clothing, (Code of practice, 2002)	Sun exposure

Mental ill-health risk factors such as fatigue and bullying are already a consideration of most management systems and practical guidance on how to control these risks has been available for a number of years.

CCI notes that the areas of concern that the Committee seek to address are complex and multi-faceted in nature. Furthermore these concerns are both inter-related and distinct, and are the subject of public health policy and government strategies in their own right. These are societal issues foremost and should be addressed as such with the workplace context a sub-class for focus and specific action plans.

Employees exercise choice to report physical conditions, much the same as they exercise choice in reporting mental health conditions. As a result however, employers are limited in how they can support their workers if employees choose not to report health issues.

Employers treat workers as a whole person with various abilities or issues and it would be erroneous to focus on a single specific health concern when managing the workforce. Employers take very seriously their responsibilities to their employees' overall wellbeing.

Employers have demonstrated that they value their workers and their mental health through proactively providing amenities, support and information, and managing working arrangements to minimise the risks of psychological harm. In this way employers have an important role to play, with the goal for people to be safe, healthy, resilient and engaged.

It is critical that industry, government, mental health experts and other stakeholders work together to continuously improve mental health outcomes. As a significant portion of the workforce is likely to be affected by mental health issues, primarily due to the prevalence of mental ill-health in the community, it is important for workplaces to be equipped to respond to these issues within their means and areas of control. In particular, different groups should work collaboratively to reduce societal stigma attached to mental illness and ensure that resources are available to assist people to avoid or manage mental ill-health.

Discussion Paper: Issues of Main Concern

> *The length of time spent on site contributes to the remoteness and social isolation experienced by workers. Limited time spent away from site also limits opportunities to seek mental health assistance away from site.*
>
> *And*
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> *Given the impact of rosters on the ability of workers to remain engaged in their family and social lives, and given the documented psychological consequences of social disconnection and isolation, the Committee is of the view that good communications services are essential to the mental health and wellbeing of the FIFO workforce.*

Since the introduction of WA's Suicide Prevention Strategy in 2009, suicide prevention has been recognised and addressed as a priority public health concern. The Mental Health Commissions' new suicide prevention strategy *Mental Health 2020* identifies rural and remote areas (including FIFO workers and families) as a risk group for mental health issues that requires a unique and customised approach.

It identifies that people living in rural and remote areas often face significant challenges to access appropriate and timely services as a result of geographical isolation including reduced opportunities for mental health interventions due to limited availability of primary health care services. The FIFO lifestyle is seen to impact not only on workers, but also their families, which in some instances compound issues through the feedback cycle.

It is critical that government, mental health service providers and industry, work together to continuously improve mental health outcomes in rural and remote areas.

Mental Health 2020 outlines a commitment to developing state-wide mental health services and supports in ways that meet the diverse and unique needs and circumstances of rural and remote communities which includes:
- The support and development of innovative approaches to service delivery in rural and remote communities which draw on partnerships with local and metropolitan services and use state of the art technologies to facilitate services;
- Improved state-wide emergency response and crisis services;
- Promotion of mental health issues in rural and remote regions in order to cultivate awareness and more resilient communities;
- The development of a database of Western Australian mental health services which operate in regional areas;
- Expansion and development of suicide prevention community action plans to address the needs of Fly-in Fly-out workers; and
- Mental health campaigns targeted at the wellbeing of Fly-in Fly-out workers and their families.

CCI strongly supports these planned initiatives and believes that this would provide a framework and resource network that employers could tap into in order to provided needed support to their employees.

Poor communication infrastructure is also identified as a risk factor to mental ill-health. Infrastructure planning is necessary to provide government, businesses and citizens with a clear direction for infrastructure investment, to prevent shortfalls and to ensure that funding is allocated to projects which will deliver the greatest benefits to the community as a whole.

WA has recently seen an increase in a range of initiatives from across government which relate to regional infrastructure planning. This included the Pilbara Cities (2012) and Western Australian Regional Freight Transport Network (2013) Plans. A key focus area for these plans included telecommunications.

The Pilbara Cities vision in particular is to build the population of Karratha and Port Hedland into cities of 50,000 people, and Newman to 15,000 people by 2035, with other Pilbara towns growing into more attractive, sustainable local communities.

CCI strongly supports these government initiatives that provide benefits not only to the local economies, but to the general wellbeing of the local communities, businesses and employees within these regions.

> *On the evidence made available to the Committee, a stigma associated with mental health pervades the resources sector, particularly because of the 24x7 nature of FIFO. This stigma is a significant workplace cultural issue and is a major barrier to encouraging help seeking behaviour amongst the FIFO workforce.*

Increasingly workplace mental health is being recognized as a significant issue for businesses and stigma associated with mental health is evident across all industry sectors as it is in society more broadly.

CCI members, including those from large and small organisations across a variety of industries, and those specifically engaged in mining, oil and gas, contracting and construction demonstrate a high level of interest and commitment to employee health and safety including mental and physical wellbeing. As previously noted, our members utilise a broad range of strategies as well as targeted mental health initiatives to increase awareness and understanding of mental health issues and to reduce stigma.

CCI formally partnered with beyondblue in promotion of the Heads Up campaign (a joint initiative from beyondblue and the Mentally Healthy Workplace Alliance (MHWA)) which has been utilised by a significant number of our members.

Through Heads Up, employers can support the mental health and wellbeing of their staff, by developing a tailored and practical action plan for creating a mentally healthy workplace, based on their specific needs and business context.

In particular, a Heads Up action plan: addresses stigma associated with mental health; increases the skills and confidence of everyone in the workplace to approach someone they are concerned about; and encourages employees with mental health conditions to seek treatment and support early.

There is a vast amount of information, free advice and resources available through organisations like beyondblue which are focussed on assisting everyone who may be affected by mental health issues and have well established networks for distribution of material. Additional funding to these types of broad reaching and trusted programs should be a focus of further strategies to optimise the foundation that has been created by beyondblue, Mates in Construction, FIFO Families, OneLife and employers across the State.

> *The Committee will consider whether additional on-site psychosocial supports and services would be a feature of modern FIFO work practices if employers were required by law or regulation to give regard to psychological and mental health factors when designing the operation of the accommodation facilities.*
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> *And*
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> *What is a safe system of work to ensure the mental health and wellbeing of workers?*

CCI considers current Western Australian occupational safety and health (OSH) legislation and harmonised work health and safety legislation adequately cover psychological health risk control under duty of care and risk management provisions and CCI does not support the introduction of additional prescription.

Model WHS legislation was drafted following extensive consultation and consideration by SWA about the scope and detail of regulatory regulation around work health risk. Psychological health is explicitly included in the definition of 'health' for the purposes of WHS. It is duplicative to revisit this specific aspect particularly in light of recent COAG and SWA reviews regarding the effectiveness of the WHS legislation.

In discharging the duty to provide a safe system of work, employers apply the concept of reasonable practicability. This means that employers must identify the type and seriousness of a risk, the likelihood of it occurring and then implement a proportionate risk control strategy to minimise the risk. Employers in the resources industry conducting FIFO work arrangements have a variety of control strategies in place to manage the physical and mental health and well-being of their employees.

Employers are not required to completely remove all risks at all costs as this is impossible. There are often circumstances where it is not reasonably practicable to implement a specific control measure to completely remove the risk. It must be recognised that this is particularly relevant to the limitations on the amount of influence that an employer can exert over the free will of a person to take actions which may result in self - harm.

Appendix A: Other issues of concern

> *It has been reported to the inquiry that people have stopped taking their antidepressant medication, or have not commenced taking it, as a result of fear of adverse consequences for their employment should their use of medication be discovered.*

Antidepressant use should not be inexplicably linked to mental health conditions. Although antidepressants were developed to treat depression, numerous research studies have shown that they can also be effective as analgesics (drugs that reduce pain). GPs may prescribe antidepressants to treat such chronic pain conditions as migraine headaches, diabetic neuropathy and fibromyalgia. Similarly, antidepressants are effective in treating symptoms of irritable bowel syndrome and other functional gastrointestinal disorders.

Employees are protected by the General Protection provisions prescribed in Part 3-1 of the Fair Work Act 2009 (Cth) which prohibits an employer from taking adverse action against a person for reasons including physical or mental disability. This protection would extend to situations where a person discloses their prescribed medications. State and Federal discrimination laws provide similar protections. Furthermore, if an employer is made aware of a condition they have a duty of care and must make reasonable accommodations for that employee. It is therefore more beneficial to employees to make their employer aware of their health conditions. By not disclosing medications, or ceasing medications, employees are potentially undermining the ability of their employer to provide support and assistance and may be creating a risk to themselves and others.

> *The CFMEU expressed the view that more should be done to protect individuals in camp arrangements from bullying and harassment. Given the reluctance of many employees to make formal complaints to DMP, this is not an exclusively regulatory problem. The reluctance of employees to come forward is connected to the same workplace cultural problems that create fear and stigma about mental health issues.*

CCI believes that this is again broader than the workplace, and is a societal and community wide issue. Many workplaces or environments, such as schools and universities, have the same concerns in regards to bullying or harassment behaviour and reluctance to report.

It is a workplace right of employees to make a complaint about bullying or harassment. Employees are protected under General Protection provisions from any adverse action being taken against them in relation to a complaint being made, which extends to camp arrangements. State laws also prohibit victimisation of employees who have made complaints in relation to harassment. Furthermore, access to confidential assistance services or Unions is available to employees if they are reluctant to speak to their employer.

> *Alcohol is often used as a non-effective coping mechanism by FIFO workers experiencing lower levels of mental wellbeing. The ready access to alcohol on site means that it is all too often the default choice for dealing with stress, anxiety or other problems. The Committee acknowledges that many sites place limitations on the amount of alcohol that can be purchased by workers, but many submitters raised concerns about the permissive drinking cultures that remained prevalent on a number of sites.*

Alcohol is often used as a non-effective coping mechanism by individuals across all industries and this is not unique to FIFO. CCI provided in the last submission to this Inquiry, a detailed account of activities and facilities made available to FIFO workers by their employers. This range of activities available includes gymnasiums and sports which are an effective coping mechanism for dealing with stress, anxiety or other problems.

Alcohol is often less available to FIFO workers when away at work with many sites having a zero tolerance approach to alcohol and other drugs. Consequently workers are well informed that it is a breach of the employers' policy if they are found to be intoxicated or do not pass a drug test. As a result of this, most workers understand that they can only drink a limited amount if they are to work the next day, and this influences their choice to consume alcohol in unhealthy quantities.

> *Financial stresses often mean that the only choice for a FIFO worker is to continue in a FIFO role despite possible impacts on their health and wellbeing.*

Every person has the personal choice to remain in a role or seek alternative employment. Providing financial counselling to people not compatible with a FIFO role who are experiencing financial concerns would better address the issues than attempting to deal with mental health issues that will continue to arise if the person is not suited to FIFO work arrangements.

Providing these services is consistent with the broader financial education programs that have been introduced nationally. Assisting employees to secure alternate employment outside of FIFO work arrangements and to manage their financial affairs would reduce the risk factors for those people more effectively than primary health services after the condition has escalated.

This approach better targets the root cause of the distress experienced by some employees in FIFO work arrangements when they are away for work. The benefits of this approach extend beyond the workers to their families.

> *The Committee would be interested to receive information from contractor companies that details their policies for employee wellbeing, and how they interact with the policies of the bigger companies.*
> *The Committee would value more information on how the health and wellbeing policies of high level companies trickle down to employees who may be employed by contractors and subcontractors. The Committee would be interested to know if there is any significant difference in the services and programs available to a person with a mental health issue based on which company in the hiring chain they are employed by.*

CCI members advise that projects generally have an EAP available to all employees involved throughout the life of the project, including the employees of the contractors. Contractually the client (or project engineer) is responsible for the Safety Management Plan at sites which includes employee assistance support to everyone at the site. Contractors on a project have to comply with directions set out in the Plan as a minimum standard for the job.

Additionally, a number of CCI contracting companies advise that not only do they provide information to their employees about mental health and support services, but all employees who work on the project are again provided this information in connection to the project at site inductions.

On a practical level, every person regardless of their employment status, has access to the support and services stipulated in the Safety Management Plan as a minimum.