

Gulfof**Mexico**



Operations – HSE

Fitness for Duty Policy (Offshore)



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AMENDMENT RECORD

Amendment Date	Revision Number	Amender Initials	Amendment
02/01/16	5	Laura East Mark Glencross Diana Haines	Revised Format. Condensed Purpose and Scope. Removed Rehabilitation Plans and Work Hardening from definitions and added Functional Job Descriptions. Updated job titles in Section 3.1. Added examples of For Cause situations in Section 4.1.4. Removed Section 5.3-Summary. Added Attachment 10, Medical Aspects of Fitness for Offshore Work (no longer a stand-alone Policy). Removed protocol for Offshore Fire Team Members.
08/18/15	4	Valerie Murray Health Manager	Changed next Review Date to February 1, 2016. Changed Document Authority and Custodian, no other revisions.
08/14/12	3	Health and Industrial Hygiene Team Leader	<p>Sections 2,3,4,5 some minor rewording. 5.2.6 New hires and fire team members may retest 1 time only. 3.0 New job positions added according to blueprint. All job descriptions reevaluated and rewritten. Jobs grouped by like physical requirements. New job descriptions including fire team member added. All mention of rope swing removed from jobs. Appendix A added - light duty guidelines.</p> <p>6.0 UPS-US-SW-GOM-HSE-DOC-00251-2 has been made obsolete and the offshore job descriptions have been added as attachments to this document. UPS-US-SW-GOM-HSE-DOC-00042-2, UPS-US-SW-GOM-HSE-DOC-00043-2, UPS-US-SW-GOM-HSE-DOC-00044-2, and UPS-US-SW-GOM-HSE-DOC-00045-2 have been made obsolete and replaced with Pass/Fail Critical Essential Demands of the Job which has been added as an Attachment 1 to this document.</p>

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1 Purpose and Scope

The purpose of this Policy is to establish criteria to provide reasonable assurance that employees and contractors placed in the offshore work environment are fit to safely perform their assigned duties without excessive risk for harm to themselves or others.

This Policy meets the requirements of BP’s Group Essential 3.4.4 relating to fitness for task.

2 Key Responsibilities

Health Manager- Serves as technical support or single point of accountability regarding development and updating of the Fitness for Duty Policy.

Occupational Health Physician (OHP) – Consultant for policy, procedures, and for managing complex fitness for duty cases.

Occupational Health Nurse (OHN) – Manages and directs the implementation and operation of the fitness for duty program on a day to day basis. Schedules “for cause” and “return to work” fitness for duty testing. OHN communicates to the medic, Human Resources (HR), Health & Safety Site Lead (H&S Site Lead), and facility management as appropriate. Ensures an annual verification review of job tasks is conducted and takes appropriate action to update the program.

Employee - New hires, transfers, and those with for cause situations or returning to work after an illness or injury are responsible to undergo any required medical evaluation and fitness for duty agility test. Employees are responsible to notify their Supervisor or OHN of any health event that may impact fitness for duty or ability to perform safety sensitive tasks or emergency duties (i.e. drills, evacuation, fire team, etc.).

Supervisor - In a “for cause” situation, the OIM, Supervisor, or Team Leader shall document and report observed behaviors of the employee when there are concerns regarding safety and fitness for work. They will collaborate with HR, Legal and the OHN to resolve the issue.

Third-Party Administrator (TPA) - Schedules medical evaluations (physicals) and fitness for duty agility tests for new hires and transfers using clinics with established medical criteria and protocols validated by a quality control program. Reviews results and contacts HR regarding completion. Responsible to communicate the results of the exam and/or the fitness for duty agility test to the candidate or employee. Responsible to provide the functional job description (FJD) to medical providers that perform medical evaluations according to this Policy. The TPA is responsible to use occupational medicine providers or physicians that are familiar with the offshore environment.

If any part of the examination or fitness for duty agility test results in a question regarding the candidate’s ability to perform their essential job functions, the TPA, HR, and OHN shall collaborate to resolve the issue.

Fitness for Duty Testing Facility - Administers the fitness for duty agility test according to established standards and protocols. Communicates results of the test to the OHN and/or TPA as appropriate.

Human Resources (HR) – Collaborates with the TPA, OHN, OHP, employee or candidate, and supervision regarding complex cases. Keeps OHN informed of new job titles. Responsible for notifying the TPA to schedule transfer medical evaluations.

3 General Requirements

Numerous factors distinguish the offshore from the onshore workplace. These can include:

- Physical exertion requiring a moderate to heavy degree of physical stamina and agility (e.g., climbing walkways / ladders / stairs and working at heights)
- Shift work with long hours (e.g., twelve hour shifts and changes in work routine)
- Absence from home and family for prolonged periods (i.e., more than one week)
- Adverse weather, including heat and cold exposure
- Helicopter and boat travel
- Emergency situations, including abandonment, may involve the individual being exposed to extremes of physical exertion and to thermal / smoke exposure as well as cold water immersion
- Need to undergo training in emergency response and sea survival / helicopter escape training
- Limited privacy
- Remote location may prohibit or delay medical access onshore or evacuation from the offshore location

Episodes of ill-health or physical impairment which may be wholly compatible with onshore employment may disqualify the individual from offshore work - either temporarily or permanently - where the condition places the affected individual and / or other colleagues at risk. The physical and mental health of an individual must not cause an additional hazard to himself/herself in an emergency situation. As a result, fitness for duty offshore is critical. Clinicians should reference Attachment 10 Medical Aspects of Fitness for Offshore Work and the GoM Region Medication Policy.

Fitness for duty (FFD) evaluations shall include pre-placement/new-hires, transfers and return-to-duty following an absence due to illness or injury and for cause situations. Both a medical evaluation and a agility test may occur as part of an overall FFD evaluation.

3.1 Applicable Job Positions

Personnel working rotational shifts offshore are covered by this Policy. The positions listed below have validated FJDs and those job titles with similar physical requirements have been grouped together on a single FJD (See Attachments 2-8). Additional job titles may be added to new or existing FJDs as identified. Visitors to the offshore arena are expected to have a level of fitness compatible with the offshore environment and their role.

Category Listing

- 1 Completion Engineer
- 1 Drilling Engineer
- 1 Health & Safety Site Leader
- 1 Maintenance Team Leader
- 1 Offshore Construction Supervisor
- 1 Offshore Facility Engineer
- 1 Offshore Installation Manager (OIM)
- 1 Offshore Process Safety Specialist
- 1 Operations Team Leader
- 1 Production Team Leader

Alphabetical Listing

- 4 Automation Specialist
- 5 Ballast Control Operator
- 2 Chemical Technician
- 1 Completion Engineer
- 2 Control Room Operator
- 1 Drilling Engineer
- 3 Electrical Technician
- 7 Fire Team Member
- 1 Health & Safety Site Leader
- 4 Instrument Technician

1	Rig Engineer	3	Maintenance Lead Tech
1	Site Lifting Coordinator	1	Maintenance Team Leader
1	Sub Sea BOP Specialist	5	Marine Team Leader
1	Well Site Leader	5	Marine Team Leader
2	Chemical Technician	6	Material Coordinator
2	Control Room Operator	2	Measurement Technician
2	Measurement Technician	3	Mechanical Technician
2	Production Lead Technician	1	Offshore Construction Supervisor
2	Production Technician	1	Offshore Facility Engineer
3	Electrical Technician	1	Offshore Installation Manager (OIM)
3	Maintenance Lead Tech	1	Offshore Process Safety Specialist
3	Mechanical Technician	1	Operations Team Leader
4	Automation Specialist	6	Planner
4	Instrument Technician	2	Production Lead Technician
5	Ballast Control Operator	1	Production Team Leader
5	Marine Team Leader	2	Production Technician
5	Marine Team Leader	1	Rig Engineer
6	Material Coordinator	1	Site Lifting Coordinator
6	Planner	1	Sub Sea BOP Specialist
7	Fire Team Member	1	Well Site Leader

FJDs will be reviewed by the OHN if there are changes to job tasks or equipment affecting the physical demands needed to perform the job. Job tasks and equipment will be reviewed for changes during the annual health plan review.

4 Process

4.1 Reasons

4.1.1 Pre-Placement / New Hires

HR will inform each new hire individual that final employment status is contingent upon the recommendations of the medical evaluation and satisfactory completion of the agility test. HR will advise the new hire regarding scheduling and instructions for both evaluations. (This program also applies to those working in the capacity of interns.)

4.1.2 Transfers

Current BP employees who have accepted a job transfer from an onshore job to an offshore position will require a medical exam and agility test and the transfer will be contingent on satisfactory completion.

If an employee is transferring from one offshore job to another and the new job is considered more physically demanding than their current position, a medical evaluation and agility test may be required. The agility test will be based on the FJD for the individual's new role. A medical evaluation may or may not be required depending on the nature of the change in job duties and whether any recent (within 6 months of approved transfer date) company medical evaluation has been completed.

Individuals will be advised to contact HR for instructions and scheduling for medical exams and agility testing.

4.1.3 Return to Duty

Individuals returning to duty after an injury/illness may be required to have a medical evaluation and/or agility test. The OHN will determine the need on an individual basis. These evaluations will be reviewed by the OHN and the results concerning duty status will be communicated to the employee, HR and the Supervisor.

NOTE: Essential critical demands of return to duty testing will be shared with employees to provide adequate preparation. Treating physicians must provide a written medical release prior to testing.

4.1.4 For Cause

When there is reasonable belief, supported by objective and articulable evidence, that a BP employee's ability to perform his or her job is impaired by a medical condition or when individuals disclose to BP management, the offshore Medic, HR, or the OHN that they are having problems with or have concerns about their ability to perform any work task safely, a FFD evaluation should be considered.

Examples of when it might be appropriate to make a medical inquiry or require a FFD evaluation include:

- A. The employee's job duties require heavy physical labor on a regular basis. During a break the employee appears to become light-headed, has to sit down abruptly, and seems to have difficulty catching his breath. When asked whether he is feeling ok, the employee tells his supervisor that this has happened to him a few times during the past several months and he does not know why;
- B. The employee has been excessively absent, his or her performance has noticeably declined, and the Supervisor has reason to believe that a medical condition may be the cause. For example, when questioned about her poor performance, the employee tells the Supervisor that the medication she is taking makes her lethargic and unable to concentrate;
- C. The employee has recently exhibited paranoid or physically aggressive behavior and the Supervisor has reason to believe, based on past experience with this employee, that there may be a medical explanation for his or her behaviors.
- D. The employee mentions he or she is on narcotic pain medication for a back condition and their job requires lifting;
- E. The Supervisor believes the employee may pose a threat to himself or others based on the fact that he or she has been sending rambling, bizarre, and inappropriate e-mails to co-workers;
- F. Employee A and Employee B are close friends. Employee A tells his supervisor that Employee B has tuberculosis (a contagious life-threatening medical disease). Based on the supervisor's experience with Employee A, he concludes that his report is credible;

If there is evidence to support a For Cause situation, the Supervisor and HR should contact the OHN to discuss whether further medical information and/or an FFD evaluation is necessary. The OHN will interview the employee and may do the following: contact the personal physician, require an agility test and/or a medical examination, and/or require drug and alcohol testing to make final recommendation regarding fitness for duty.

4.1.5 Direct Labor / Full Service Contractors Fitness for Duty

In order to assist in maintaining a safe working environment it is essential that contractors and subcontractors are physically able to perform the duties associated with their assigned tasks.

Contractors who perform direct labor on offshore BP managed locations or BP managed shore bases must have and administer a formal Fitness for Duty Policy which must include a medical exam and agility testing.

Full service contractors should have a Fitness for Duty Program that meets or exceeds this Policy.

4.2 Examination and Testing

4.2.1 Medical Evaluation

Preplacement and transfer medical evaluations will be conducted by a physician who has the qualifications and experience to perform the evaluation. In either return to duty or “for cause” scenarios, the examining physician will be provided with the specific area of concern or reason for requesting the evaluation. A specialist physician may be requested. In those situations where a medical evaluation reveals fitness for duty concerns or the need for additional medical information, the individual will be advised and given the opportunity to provide the needed information via a personal healthcare provider at his / her own expense.

4.2.2 Agility Testing

Agility testing will be conducted following medical approval as determined by the medical evaluation or treating physician’s recommendation. Testing will be conducted at designated locations. The appointment for testing will be arranged for the individual by the TPA or OHN. In either case, the testing provider will be provided authorization for testing as well as verification of job title and corresponding essential functional demands of the test from the FJD.

In return to duty and “for cause” situations, the OHN will provide the testing provider with more detailed information regarding the history and / or the specific nature of concerns. (See Attachment 1 - Pass/Fail Critical Essential Demands of the Job)

4.2.3 Evaluation Outcome

For new hire evaluations, results will be released to HR in the form of “approval,” “approval with restriction,” “not approved,” or “pending.” For return to duty evaluations or “for cause,” the results will be reviewed and a final recommendation will be made by the OHN to supervision and HR. In those situations where any components of either the medical evaluation or agility testing resulted in failure to be released to work offshore, the individual will be informed of the nature of the deficit and the recommended action that may result in success upon future retest.

4.2.4 Limited Duty

In “for cause” and return to work situations, it may be possible that impairments requiring activity or job task restrictions identified via medical and / or agility testing may be temporarily accommodated with a review of the need for continued accommodation within 3 months. Accommodation may be provided in locations other than offshore depending on the nature of the individual’s job, skill sets, and availability of other work for which the individual is suited. On some occasions, accommodation may not be possible. This individual will be sent home on leave pursuant to applicable company policy (See Attachment 9, Limited Duty Guidelines).

4.2.5 Agility Re-Testing

In the case of return to duty, “for cause”, and transfer agility testing failure, the individual will be provided the opportunity for two retests, for a total of three tests (the initial plus two retests). In the case of new hire testing failure, the individual will be provided the opportunity for one retest, for a total of two tests only (the initial plus one retest) and the final retest must occur within 1 month from the date of the initial test failure notice.

4.2.6 Test Failure

If a new hire fails the agility test, they cannot work offshore as a BP employee or contractor until successful completion of the retest.. If the individual fails the initial agility test and the retest he / she cannot work as a contractor or BP employee on a BP offshore location. He / she can apply for BP employment after 1-year from the initial test date.

4.2.7 Record Keeping

Records of medical evaluations shall be kept by the OHN as secure and confidential medical records. Individuals that have been tested may request copies of their medical records and fitness for duty evaluation results by sending a request, in writing, to the OHN. Refer to Access to Medical and Exposure Records Safe Work Practice .

5 Definitions and Acronyms

Fitness for duty (FFD) is the competency, as well as the physical, mental and emotional capacity to perform assigned tasks in a manner that does not unreasonably threaten safety, health, or property.

Fitness for Duty (Agility) Test is an evaluation by a trained health professional (usually a physical therapist) that approximates or mimics the physical demands of the job as defined by the Functional Job Description.

Functional Job Description (FJD) is an accurate description of the physical demands of a job. This involves an analysis of the tasks to be carried out by an employee as part of his/her role to identify the physical requirements needed to perform the role.

Direct Labor Contractors are those contractors that provide personnel supervised by BP staff.

Full Service Contractors are contractors that provide a service that includes on-site supervision of their own staff.

Pre-Placement Medical Evaluation applies to medical assessment, including questionnaire and medical testing, conducted post-offer but pre-placement for either new hires or persons considering a job transfer. Finalization of the hire or transfer is contingent on the medical recommendations of the medical evaluation.

6 Key Documents/References

GRP 3.4-0003, Fitness for Task and Health Surveillance

Medication Policy (Offshore)

Access to Medical and Exposure Records Safe Work Practice

7 Attachments

7.1 Attachment 1 – Pass / Fail Critical Essential Demands of Job



Attachment 1 Pass
Fail Critical Demands |

7.2 Attachment 2 – Validated Functional Job Description for Operations Installation Manager, Operations Superintendent, Offshore Facility Engineer, Production Team Lead, Maintenance Team Lead, Offshore Construction Supervisor, Health & Safety Site Lead, Site Lifting Coordinator and Well Site Leader.



Attachment 2

7.3 Attachment 3 - Validated Functional Job Description for Production Technician, Chemical Technician, Measurement Technician, Production Lead Technician and Control Room Operator.



Attachment 3

- 7.4 Attachment 4** - Validated Functional Job Description for Electrical Technician, Maintenance Lead Technician and Mechanical Technician.



Attachment 4

- 7.5 Attachment 5** - Validated Functional Job Description for Instrument Technician and Automation Specialist.



Attachment 5

- 7.6 Attachment 6** - Validated Functional Job Description for Ballast Control Operator and Marine Team Lead.



Attachment 6

- 7.7 Attachment 7** - Validated Functional Job Description for Materials Coordinator and Planner



Attachment 7.pdf

- 7.8 Attachment 8** - Validated Functional Job Description for Fire Team Member



Attachment 8

- 7.9 Attachment 9** – Limited Duty Guidelines



Limited Duty
Guidelines.docx

- 7.10 Attachment 10** - Medical Aspects of Fitness for Offshore Work



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