

COVID-19 roster changes

What happened?

NOPSEMA has been actively pursuing the threat posed by COVID-19 and has published an extensive range of documents on its website in support of industry managing these risks (<https://www.nopsema.gov.au/news-and-publications/covid-19/>).

As a result of this NOPSEMA is now aware that many operators are considering the introduction of modified roster arrangements to reduce the risk of COVID-19 transmission amongst members of the offshore workforce. These proposed roster changes typically include an onshore quarantine period prior to travelling offshore to reduce transmission risks, however often involve extending offshore periods. While recognising that these modifications are being introduced in response to a rapidly evolving situation, NOPSEMA has received concerns in relation to some of the proposed rosters and the manner in which the roster changes have been introduced. For example:

- insufficient workforce consultation in relation to the changes
- insufficient consideration of fatigue risk
- insufficient consideration of psychosocial hazards to workers and their families
- poor communication to the workforce of proposed additional control measures intended to minimise the risks introduced through roster changes
- introduction of roster changes outside of the Management of Change processes described in facility safety cases
- insufficient consideration of the impact that proposed roster changes may have on Major Accident Event (MAE) risk across the facility.

NOPSEMA has undertaken some inspections in response to proposed COVID-19 roster modifications, and will continue to do so to ensure that facility operators are utilising appropriate workforce consultation, risk assessment, and management of change processes.

What could go wrong?

Fatigue risks associated with extended rosters include increased likelihood of injury (physical fatigue) and error (mental fatigue). Increased likelihood of error caused by mental fatigue can increase MAE likelihood for MAEs with control measures that are critical human tasks. That is, those activities people are expected to perform as barriers against the occurrence of an incident, or to prevent escalation in the event that an incident does occur, including activities required to support or maintain physical and technological barriers.

Psychosocial risks associated with extended rosters include onset or exacerbation of psychological injury such as depression, anxiety, and suicidal ideation. The 'resting level' of anxiety among the general population is arguably higher than normal in response to the global COVID-19 pandemic. The introduction of extended rosters may therefore represent a greater psychosocial risk than would otherwise be the case.

Research suggests that Fly-In Fly-Out workers may experience higher rates of depression, anxiety, and stress symptoms than that of the general population. Members of the workforce with previous or pre-

existing psychological injury are likely to be at greater risk of relapse and escalation of symptoms in response to extended roster arrangements.

When considering the psychosocial risks associated with extended rosters, operators should include evidence-based information about the psychological health of their offshore workforce, and should not assume predominantly sound levels of psychological health across the workforce.

While NOPSEMA recognises the significant risk reduction provided through mandatory pre-mobilisation isolation periods to help prevent the spread of COVID-19, operators should be aware that psychosocial risks are likely to be heightened for members of the workforce required to undertake such an isolation period. Operators and responsible parties should also be aware that the onset or exacerbation of psychological injury associated with extended rosters must be reported to NOPSEMA as an accident.

Key lessons

Operators introducing changes to their rosters in response to COVID-19 should ensure that risk assessments for fatigue and psychosocial hazards are undertaken, comprehensive, and involve extensive workforce consultation. Changes to rosters should be managed, and documented, through established Management of Change processes, and this would be expected to include appropriate workforce consultation.

Assessment of psychosocial hazards should include consideration of a broad range of factors, for example:

- pre-existing or previous psychological injury
- the effects of extended absence from family during a pandemic
- the heightened risk of psychosocial harm during periods of pre-mobilisation isolation.

The legislation

Duties

Schedule 3 of the Offshore Petroleum and Greenhouse Gas Storage Act (OPGGs Act) imposes general and specific duties relating to occupational health and safety.

Clause 9(1) requires that the operator of a facility must take all reasonably practicable steps to ensure that:

- (a) the facility is safe and without risk to the health of any person at or near the facility; and
- (b) all work and other activities carried out on the facility are carried out in a manner that is safe and without risk to the health of any person at or near the facility.

Clause 9(2)(d) requires operators to take all reasonably practicable steps to implement and maintain systems of work at the facility that are safe and without risk to health.

Clause 9(2)(g) requires operators to take all reasonably practicable steps to monitor the health and safety of all members of the workforce and keep records of that monitoring.

Similar duties are imposed on persons in control of parts of a facility or particular work [Clause 10(1) and (2)(c)] and employers [Clause 11(1) and (2)(c)].



Clause 9(2)(i) requires that a facility operator take all reasonably practicable steps to develop a policy, relating to occupational health and safety, that will enable the operator and members of the workforce to cooperate effectively in promoting and developing measures to ensure the occupational health and safety of persons at the facility.

Regulation 3.1 of the Offshore Petroleum and Greenhouse Gas Storage (Safety) Regulations 2009 states that responsible persons must not allow, or require, a member of the workforce who is under the person's control, to work for: (a) a continuous period; or (b) successive continuous periods; of a duration that could reasonably be expected to have an adverse effect on the health or safety of the member of the workforce or other persons at or near the facility. Responsible persons are defined as an operator; an employer; or another person in control of a facility, part of a facility, or particular work carried out at a facility.

Reporting

Clause 82(1) of Schedule 3 of the OPGGS Act requires that if, at or near a facility, there is (a) an accident that causes the death of, or serious injury to, any individual; or (b) an accident that causes a member of the workforce to be incapacitated from performing work for a period prescribed for the purposes of this paragraph; the operator must, in accordance with the regulations, give NOPSEMA notice of the accident or dangerous occurrence.

Clause 3 of Schedule 3 of the OPGGS Act states that **accident** includes the contraction of a disease.

References

[Guidance note - Avoiding Fatigue](#)

[Guidance note – Involving the workforce](#)

[Guidance note – Workplace arrangements](#)

[Guidance note – Powers of Health and Safety Representatives \(HSRs\)](#)

[Information paper - Human error risk reduction to ALARP](#)

[Information paper - Critical task analysis](#)

[Work-related psychological health and safety: A systematic approach to meeting your duties](#) (Safe Work Australia National Guidance Material)

APPEA and Safer Together [COVID-19 Wellbeing Framework](#)

NOPSEMA website: <https://www.nopsema.gov.au/news-and-publications/covid-19/>

COVID-19 Industry Preparedness: <https://www.nopsema.gov.au/news-and-publications/latest-news/news-announcement/2020/03/20/covid-19-industry-preparedness/>