



Risk-Based Health Assessment Program Standard

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Controlled Document
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Summary of Changes

This Summary shows:

- The location of each change within the document
- All changes to this document since it was last approved and published

Location of Change	Summary of Change
Various locations (Rev 1.1)	Minor changes to Audience, Roles & Responsibilities and Definition sections are required to reflect that this standard applies to all types of contractors.



R# Requirements changed in the new revision will be identified with a revision triangle beside it.

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1 About this Standard

Purpose

This standard outlines specific responsibilities and expectations of a Risk-Based Health Assessment program, which is a program designed to:

- Protect and manage worker health at various stages of employment
 - To confirm the ability to perform job requirements
 - To monitor occupational health-related to exposures in the work environment
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Scope

This standard applies to any occupational exposure where worker health is identified as being a potential risk during the course of their duties and ensuring compliance with all legal requirements including all legislative and regulatory requirements.

Target Audience

This Standard applies to Suncor Energy Inc. and subsidiaries over which Suncor has operational control (collectively “Suncor” or “the company” or “enterprise-wide”).

As used in this document, “Suncor personnel” includes directors, officers, employees, Contractor and Contract Worker of Suncor.

Conformance Expectations

Conformance to all new or updated requirements in this standard is required within five years of the approval date.

In addition to what is provided for in this standard, Suncor Personnel must comply with the requirements of applicable laws and regulations relating to the matters covered by this Standard.

If a deviation to this standard is required you must follow the GDF deviation process.

2 Requirements

2.1 Program Requirements

Risk-Based Health Assessment Program The following provides the overarching requirements for establishing a Risk-Based Health Assessment Program:

- 2.1.1 Suncor shall establish a Risk-Based Health Assessment Program that consists of the following:
- Conduct standardized Risk-Based Health Assessments
 - Ensure that Risk-Based Health Assessments comply with all applicable laws including all legislative and regulatory requirements
 - Ensure that Risk-Based Health Assessments align with job requirements
 - Define Risk-Based Health Assessments (including where regulatory requirements do not exist)
 - Use a standardized approach for documentation and record keeping
 - Outline the roles and responsibilities for meeting the requirements of the program if they are different from the roles outlined in the Roles and Responsibilities section
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2.2 Roles and Responsibilities

Health & Wellness Site Services Personnel Health and Wellness (H&W) site services personnel shall:

- 2.2.1 Administer the Risk-Based Health Assessment program, ensuring Suncor is compliant with all legal requirements including without limitation:
- Occupational Health & Safety Legislation and Regulations
 - Privacy Legislation and Regulations
 - Human Rights Legislation and Regulations
- 2.2.2 Schedule and conduct or coordinate the following categories of Risk-Based Health Assessments only for Suncor employees (click the term to go to the definition in this document):
- [Pre-placement Health Assessment](#)
 - [Transfer Health Assessment](#)
 - [Periodic Health Assessment](#)

- [Post-exposure Health Assessment](#)
- [Exit Assessment](#)
- [Position and/or profession specific health assessment](#)

- 2.2.3 Ensure all Risk-Based Health Assessments are completed for Suncor employees through collaboration with leaders.
- 2.2.4 Make recommendations and/or referrals as appropriate based on the findings and/or results of Suncor employee Risk-Based Health Assessments.
- 2.2.5 Consult with industrial hygiene personnel on any reported concerns of workplace exposures.
- 2.2.6 Prepare and submit reports of occupational exposures when required to do so.
- 2.2.7 Ensure all Suncor employee Risk-Based Health Assessments are documented in the Suncor designated electronic medical database, in the standardized manner and in compliance with privacy standards.
- 2.2.8 Conduct all required measurements and verifications of the Risk-Based Health Assessment program for Suncor employees.

**Director, EH&S
Central Health &
Wellness**

The Director, EH&S Central Health & Wellness shall:

- 2.2.9 Ensure Risk-Based Health Assessment programs are in place across the enterprise, aligned with all legal requirements including all legislative and regulatory requirements, and executed to plan.
- 2.2.10 Report metrics for Suncor employees in the quarterly H&W stewardship report to the Environment, Health and Safety Leadership Team (EHSLT).

Employees

All Suncor employees shall:

- 2.2.11 Participate in and co-operate with any Risk-Based Health Assessment program and any scheduled assessments.
- 2.2.12 Participate in any additional testing and assessments recommended by H&W site services personnel to confirm their ability to perform their job requirements.
- 2.2.13 Notify H&W site services personnel, in writing, of any refusal to participate in any Risk-Based Health Assessment program.
- 2.2.14 Report any concerns of work-related exposures to their leader.

**BU and FN
Leaders**

Suncor Business Unit (BU) and Function (FN) leaders shall:

- 2.2.15 Ensure that any required Risk-Based Health Assessments are scheduled during normal working hours for Suncor employees. Where not reasonably practical to be carried out during normal hours, credit the employee for attendance outside of normal working hours.
- 2.2.16 Report any concerns of work-related exposures to site industrial hygiene, H&W, or EH&S.
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**Human Resources
Personnel**

Human resources personnel shall:

- 2.2.17 Ensure Suncor employees are referred to H&W site services personnel for the following Risk-Based Health Assessments:
- Pre-Placement Health Assessment
 - Transfer Health Assessment
 - Exit Assessment
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**Industrial Hygiene
Personnel**

Industrial Hygiene Personnel shall:

- 2.2.18 Provide personal sampling data to support the Risk-Based Health Assessment process.
- 2.2.19 Provide recommendations for Exposure Groups requiring Risk-Based Health Assessments as a result of any chemical, physical, biological, and/or physiological potential hazards in the workplace.
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**Contractor or
Contract Workers**

Contractor or Contract Workers shall:

- 2.2.20 Meet or exceed the requirements of this standard and meet the requirements of Fit for Duty as defined in the [Environment, Health and Safety Requirements for Mode 1 Contractors](#) or the [Environment, Health and Safety Requirements for Mode 2 Contractors](#).
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**Suncor Contract
Coordinator or
Representative**

The Contract Coordinator shall:

- 2.2.21 Report the concern to site EH&S when informed of a health related concern by a Supplier or Contract Worker.
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2.3 Measurements and Verifications

A Risk-Based Health Assessment program provides a methodology for measurement and verification to ensure adherence to any Risk-Based Health Assessment program and compliance with all legal requirements including all legislative and regulatory requirements. This will be accomplished with an audit process guided by OEMS Element 16 to ensure quality control and trend identification to support continuous improvement (Suncor, 2015).

Performance Measurement

The following measures will be tracked monthly by H&W site services personnel:

- 2.3.1 The total number of Risk-Based Health Assessments completed.
- 2.3.2 The percentage of each type of Risk-Based Health Assessment completed, including Pre-Placement Health Assessment, Transfer Health Assessment, Periodic Health Assessment, Post-Exposure Health Assessment, and Exit Assessments.
- 2.3.3 The percentage of Risk-Based Health Assessments with indications of abnormal results requiring further assessment, referral, and/or reporting.
- 2.3.4 The percentage of Risk-Based Health Assessments in compliance with all legal requirements including all legislative and regulatory requirements within each jurisdiction.
- 2.3.5 The percentage of Risk-Based Health Assessments not completed including tracking the rationale for non-completion.

Conformance Measurement

The following verifications of conformance with this standard will be tracked.

- 2.3.6 H&W site services leadership team shall review and audit a representative number of each type of Risk-Based Health Assessment to determine conformance to the standard requirements for Suncor employees.
 - 2.3.7 The Director, Central H&W site services shall report the above tracking measures for Suncor employees in the quarterly H&W stewardship report.
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3 Terms and Definitions

Term	Definition
Contractor or Contract Worker	As defined by the Environment, Health and Safety Guidelines Mode 1 Contractors and Mode 2 Contractors documents.
Exit Assessment	A health assessment conducted at the time of termination of employment used to determine and document a worker's state of health at that particular point in time (OSHA).
Exposure Group	A group of workers exposed to the same general magnitude/concentration, duration and frequency of an occupational health hazard (American Industrial Hygiene Association, 2011)
Legislation	A written law, sometimes referred to as an Act or statute enacted by the legislative arm of a government (Government of Canada, 2006)
Periodic Health Assessment	A health assessment conducted at regular intervals for the purpose of early identification of illness, evaluation of health, feedback on controls and training/education for employees (Government of Canada 2013).
Position and/or profession specific health assessment	A health assessment guided by legislation, regulation or standards of a particular position and/or profession (Government of Alberta, 2009).
Post-Exposure Health Assessment	A focused health assessment following an exposure and/or a potential exposure in the workplace (Government of Alberta, 2009).
Pre-Placement Health Assessment	An initial baseline health assessment used to determine whether an individual is fit to perform the job without risk to themselves or others (Government of Canada 2013).
Procedure	Documents of mandatory instructions or steps on how to execute a manual task within a business process (Suncor, 2017).
Regulation	A form of law made under the authority of an Act (the enabling Act) which defines the application and enforcement of legislation (Government of Canada, 2006)
Risk-Based Health Assessment	A process by which health care professionals analyze information regarding a worker's actual or potential occupational hazards and the effects on the health of the worker to determine the most appropriate health assessment and screening measures based on any legal requirements including all legislative and regulatory requirements as well as best practice (OSHA).
Transfer Health Assessment	A health assessment conducted prior to job transfer and/or promotion to determine the employee's fitness to work in the new position (CCOHS, 2016).

4 References

Essential Documents

The following document(s) need to be read in conjunction with this standard for full understanding.

- [Environment, Health and Safety Policy](#)
 - [Health & Wellness Privacy Standard](#)
 - [Environment, Health and Safety Guidelines for Mode 1 Contractors](#)
 - [Environment, Health and Safety Guidelines for Mode 2 Contractors](#)
 - [Requisition to Pay Standard](#)
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Referenced Documents

The following document(s) have been referenced throughout this standard.

- American Industrial Hygiene Association (2011). The occupational environment: Its evaluation, control, and management (3rd ed.). American Industrial Hygiene Association.
 - Canadian Center for Occupational Health and Safety (CCOHS) (2016). Fit to Work. Retrieved from http://www.ccohs.ca/oshanswers/psychosocial/fit_to_work.html
 - Government of Alberta (2009). Occupational Health and Safety Code. Retrieved from https://work.alberta.ca/documents/WHS-LEG_ohsc_2009.pdf
 - Government of Canada (2006). Legislation Guidelines. Retrieved from <https://www.canada.ca/en/health-canada/corporate/about-health-canada/legislation-guidelines.html>
 - Government of Canada (2013). Occupational Health Evaluation Standard. Retrieved from <https://www.tbs-sct.gc.ca/pol/doc-eng.aspx?id=12561§ion=HTML>
 - Occupational Safety and Health Administration (OSHA) (no date). Medical Program. Retrieved from <https://www.osha.gov/Publications/complinks/OSHG-HazWaste/5-6.pdf>
 - OSHA (no date). Medical Screening and Surveillance. Retrieved from <https://www.osha.gov/SLTC/medicalsurveillance/index.html>
 - Suncor (2015). Operational Excellence Management System (OEMS) Elements: Element 16: Audits and Assessments. <http://ecm/ecmlivelinkprd/lisapi.dll?func=ll&objId=306685034&objAction=download>
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- Suncor (2017). Enterprise Governing Documents Standard. Retrieved from http://ecm/ecmlivelinkprd/lisapi.dll/fetch/2000/26485365/184316755/184316027/Governing_Documents_Framework_-_Part_1_-_Standards.pdf?nodeid=162072988&vernum=-2
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The following individuals have approved and signed this document.

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Date Sunday, 21 January 2018, 09:39 AM Mountain Time

*Minor changes have been made to this document which does not require re-approval.