



MEDICAL SURVEILLANCE POLICY

PURPOSE

Sun International has a legal and moral obligation to take reasonable care to protect our employees against health and safety hazards. Furthermore, we recognise that all employees have the right to a safe and healthy working environment, and that improving the overall health of our employees is beneficial overall. In accordance with this recognition and in compliance with relevant legislation and best practice, Sun International has implemented a Medical Surveillance Policy with the intention to respect the dignity of our employees, provide a clean, safe and healthy working environment for all, and improve the overall quality of life of our employees.

SCOPE/ELIGIBILITY/APPLICATION

This policy applies to all permanent fixed term, and permanent part time employees at our properties.

DEFINITIONS

- Approved Inspection Authority
 - Any person who with the aid of specialised knowledge or equipment or after such investigations, tests, sampling or analyses as he may consider necessary, and whether for reward or otherwise, renders a service by making special findings, purporting to be objective findings, as to:
 - a) the health of any person;
 - b) the safety or risk to health of any work, article, substance, plant or machinery, or any condition prevalent on or in any premises; or
 - c) the question of whether any particular standard has been or is being complied with, with respect to any work, article, substance, plant or machinery, or with respect to work or a condition prevalent on or in any premises or with respect to any other matter, and by issuing a certificate, stating such findings, to the person to whom the service is rendered.
- Medical Examination
 - An examination carried out to determine the physical fitness of an applicant for a job, or to determine someone's physical health and provide recommendations for improvement.
- Medical Fitness
 - A medical fitness certificate is a document completed by a qualified occupational health / medical practitioner. The employee fitness certificate is to ensure that the employee is fit for the task or job he or she is to perform according to their job specification.
- Medical Surveillance Plan
 - A medical surveillance plan is a document developed that will include what medical examinations are required to be done, by occupation, and includes the frequency thereof.
- Medical Surveillance Programme
 - A medical surveillance programme involves scheduled medical examinations whereby an employee will be examined from time to time in order to pick up any changes in their health conditions due to particular hazards within the workplace, or as a general health check-up. Medical surveillance examinations are performed by a medical doctor or nurse who is certified as an Occupational Health / Medical Practitioner. It cannot be conducted by a General Medical Practitioner.

- Occupational Hygiene Survey
 - A risk assessment that is conducted every 2 years, which involves a walkthrough of the workplace that includes:
 - Obtaining an overview of the whole operation.
 - Identifying the key hazards in each area.
 - Assessing the effectiveness of any control methods in place.
 - Are measurements needed, if so, what hazards should be measured.
 - Where should measurements be taken.
 - Which workers should have their exposure assessed.
 - When should measurements be made.
 - What conclusions might be drawn from the results.

POLICY

The Occupational Health and Safety Act (OHSA), 85 of 1993 and its related regulations requires Sun International to provide a working environment that is safe and without risk to our employees' health. Employees may be exposed to any, or all, of the following stressors:

- Chemical:
 - Various chemicals (Cleaning agents, dusts of silica, clay, paints and waste material)
- Physical / Ergonomic:
 - Noise
 - Thermal Stress
 - Radiation (UV or sunlight)
 - Manual Handling
 - Illumination
 - Ventilation
- Psycho-social:
 - Shift work
 - Low morale and motivation
 - Long working hours
- Biological:
 - Exposure to live organisms that could be transferred to the employee
- Mechanical:
 - Vibration

Where employee exposure is identified as a risk, medical surveillance is required to monitor our employees' health as prescribed by various regulations. These hazards include noise, asbestos, hazardous chemical substances, hazardous biological agents, lead and working at heights.

The Basic Conditions of Employment Act (BCEA), 75 of 1997, Code of Good Practice on the Arrangement of Working Time, also stipulates that any employee performing shift work or regular night work is entitled to undergo a medical examination upon request, and the cost of the examination will be covered by Sun International.

In addition to the above legislated requirements, we aim to standardise our medical surveillance approach and conform to best practice by providing all employees with the option to conduct a medical examination. The purpose of conducting these examinations is to ensure the fair distribution of employee benefits, assist in general health promotion and in the early detection of non-occupational diseases such as hypertension or diabetes for which intervention may be provided.

Sun International appointed an occupational and primary health care provider to develop a health risk assessment and medical surveillance programme for our South African units. The medical surveillance programme includes various medical examinations for our employees, which has informed the development of this Medical Surveillance Policy.

PROCEDURE

Hazard, Control and Prevention Measures

In order to ensure compliance with our duty as prescribed by OHSA, there are various hazard control and preventative steps that must be implemented to reasonably provide a safe and healthy working environment. These include but are not limited to:

- Hazard identification
- Health Risk Assessment
- Intervention and control
- Audits and review of an occupational health programme

The hazard identification and health risk assessment identifies which aspects of the above programmes are relevant, which employees are exposed to high-risk environments, and must be repeated every 24 months. The following intervention and control measures must be implemented to mitigate the risks identified where possible:

- Environmental monitoring
 - Identification and measurement of contaminants/stressors in the work place. These assessments are conducted by Approved Inspection Authorities.
- Engineering controls
 - To reduce where reasonably practicable any dust or hazard which has been identified as being above the occupational exposure limits, or that has resulted in ill-health, injury or death.
- Personal protective equipment
 - Appropriate protective equipment must be provided in identified and demarcated areas, and employees to be instructed in its use.
- Workplace practices
 - Practices must be implemented to reduce the risk, for example dampening of dust, vacuum cleaning, stack emission control, etc. to reduce contaminants in the air.
- Medical surveillance
 - Pre-employment, transfer, routine and exit health assessments for people who work in risk areas.
- Worker information
 - Employees must be informed of the nature of the materials with which they work and of any possible hazards, which may arise from exposure to such materials.
 - Occupational hygiene and biological monitoring results must be conveyed to employees and their representatives, whilst at all times complying with patient confidentiality.

Medical Surveillance Programme

The medical surveillance programme will be developed by the appointed occupational and primary health care provider based on the following information:

- Sun International's SHE risk register's which lists all possible hazards and risks that workers may be exposed to in terms of their health and safety.
- Occupational hygiene surveys that have been completed by an Approved Inspection Authority to assess the working environment and identify relevant environmental health risks. These inspections are conducted every two (2) years as prescribed by the relevant regulations.
- Man Job Specifications which outlines each job specification and the activities required by employees to perform.
- Health Risk Assessments that will be conducted by the appointed Occupational Health / Medical Practitioner based on the above information.

The following guidelines will be applied by the Occupational Health / Medical Practitioner when developing the medical surveillance programme for specific roles or risk areas:

- Exposures to dusts, allergens (isocyanates in paints) and welding fumes requires:
 - Completing a respiratory questionnaire
 - Assessing allergies
 - Establishing smoking habits
 - A spirometry test
- Exposure to noise above 85dB, depending on the exposure level and duration may require:
 - An audiogram
- Working in a hot environment requires:
 - An assessment of the cardiovascular system, diabetes and the kidneys
- All drivers (including Heavy Vehicles and Forklifts) requires:
 - An assessment of the cardiovascular system, central and peripheral nervous system, vision and hearing
 - Establishing a present of Diabetes and / or Epilepsy
 - Previous back problems
 - Is any alcohol/medication affecting the central nervous system
 - Vision screening including visual fields tests
 - An audiogram
- Heavy Lifting requires:
 - An assessment of previous backache/back problems, injuries/fractures and the musculoskeletal system
- Exposure to UV radiation requires:
 - An assessment of the skin and eyes
- Working with Visual Display Units requires:
 - Visual screening
 - Musculoskeletal assessment
- Shift work requires:
 - An assessment of the heart and gastro-intestinal disorders
 - Stress, psychiatric disorders
 - Sleeping difficulties
 - Diabetes
 - Epilepsy

Medical Examinations

Medical examinations are the core component of the medical surveillance programme. The objective of conducting the medical examinations is to:

- Ensure the best fit between the employee and his/her work
- Ensure that the person will not be endanger themselves or others
- Obtain baseline information, e.g. audiometry or spirometry for people who will be working in high risk areas
- Improve the overall health of our employees

All medical examinations must fulfil the following criteria:

- Accuracy, i.e. the test must be valid, sensitive and specific
- The test must be relevant
- Strict quality control must be in place
- Participation in screening programmes requires informed consent, even if required by law. Consent is only "informed" if the employee understands:
 - The purpose of the test
 - The possible consequences of taking and not taking the test.
- Occupational health / medical practitioners who have a qualification in occupational health, and who are familiar with the workplace conditions will conduct these examinations.

The following types of medical examinations will be implemented across our South African units:

- Pre-employment medical examinations will be conducted on all prospective fulltime, part-time or temporary employees prior to employment.
- Transfer medical examinations will be conducted on all employees transferring to a business unit, as the risk profile present within the different business units is not always the same.
- Routine medical examinations will be conducted on all employees working in risk areas based on legislated requirements, as identified in the occupational hygiene surveys and health risk assessments conducted for each unit. An employee may not refuse to have legislated medical examination conducted.
- A general health medical examination is recommended for all other job categories that do not require routine medical examinations. Participation is voluntary however recommended to ensure that health conditions are identified and managed.
- Executive medical examinations are recommended for all senior and top management. The purpose of these examinations is to detect asymptomatic conditions such as hypertension and diabetes before they cause problems such as heart attacks and strokes. Participation is voluntary however recommended due to the increased stress associated with these job categories.
- Exit medical examinations will be conducted on all employees, who have been permanently transferred out of a risk area or are leaving employment, to ensure that no substance or process has affected their health.

Special attention will be given to the following when conducting medical examinations:

- Full History
 - Evaluation of previous employment (specific to pre-employment and transfer medicals), noting any aspects, which may have been hazardous to their health, risks and noise exposure.
 - Any complaints such as irritation of eyes or throat, shortness of breath, backache or psycho-social stress.
- Past medical conditions
 - Dermatitis, asthma, chronic cough, conjunctivitis, musculoskeletal conditions, e.g. Backache that required more than 1 day off work.
- Physical examination:
 - Focusing on the eyes, skin, respiratory tract and musculoskeletal systems.
 - Special reference to skin, conjunctivae, nasal membranes and lungs for employees exposed to chemicals.
- Cigarette smoking, past and present (number per day, number of years).
- For employees that may be at risk of having HIV, check for signs of weight loss, lymphadenopathy, oral hairy leucoplakia, thrush, seborrhoeic dermatitis, and herpes zoster (shingles) scars.
- Special investigations include:
 - Audiometry tests for employees working in a demarcated noise area
 - Lung function tests for employees who work in a 'respirator zone' area, or will be exposed to irritating fumes, sensitising agents, or work in areas where irritants affect the nose, throat and eyes, or where dust noticeably collects.
 - Further investigation where deterioration from baseline or previous tests is significant,
 - Chest x-rays. These will only be conducted at the discretion of the occupational medical practitioner.
 - Employees who report any abnormal signs or symptoms, which may be work-related, must be examined to determine whether they will be allowed to continue in their existing job or whether a transfer to another area is necessary.

- The following information and tests may be included when conducting an executive medical examination:
 - Obtain relevant medical history
 - Full medical examination including ECG and if possible, a stress ECG, and lung function tests
 - Laboratory tests including:
 - Full blood count
 - Lipid profile (total cholesterol, HDL + LDL)
 - Uric acid
 - Others as required (e.g. prostate screen)
 - Evaluation of lifestyle, e.g. stress, diet, alcohol, smoking, exercise

Medical Examination Frequency and Criteria

The frequency of testing is based on the level of risk and will be stipulated in the medical surveillance plan, but as a general rule, the following will be applied:

Testing	Criteria	Frequency
Pre-employment Medical Examinations	All new employees being recruited	Once off prior to employment
Transfer Medical Examinations	All employees transferring between business units	Once off prior to transfer
Exit Medical Examinations	All employees leaving the company	Once prior to their last working day
Routine Medical Examinations	People working in risk areas and / or exposed to specific hazards e.g. noise zones, respirator zones, shift workers, drivers	Every year / Every 2 nd year. This is dependent on the risks associated and will be determined by the Occupational Medical Practitioner
General Employee Health Medical Examinations	Recommended general health check-up to improve employee health and well-being Age: <=39 years 40 – 49 years >= 50 years	Every 3 years Every 2 years Every year
Executive Medical Examinations	Employees working in Senior and Top Management positions	Every year

Medical surveillance plans will be provided to each unit's SHE and HR Departments, indicating the relevant occupations that require the tests per unit, and the frequency. These will be established based on the health risks present as identified by the Approved Inspection Authority, the risks identified in the health risk assessment, as well as tests recommended by the Occupational Health / Medical Practitioner based on new research and best practice.

Medical Fitness

Should medical conditions be found during a medical examination, specific conditions may be applied, these include:

- Respiratory Disease such as Asthma or Chronic Bronchitis
 - These conditions may restrict an employee from working in an environment where there is smoke, dust, fumes, etc. which would aggravate a pre-existing condition.
- Tuberculosis
 - Employees previously treated for TB may be employed in risk areas as long as their lung function tests are above 75% and deemed normal.

- Diabetes
 - Insulin-dependent diabetics will be deemed unfit to work where they may inadvertently injure themselves or others in the event of a hypoglycaemic attack.
 - They should therefore not work near unguarded moving machinery, up ladders, cranes or scaffolding, or drive heavy-duty vehicles.
 - Diabetes treated with diet and oral agents can undertake most occupations provided they are well controlled and do not experience hypoglycaemic attacks.
- Epilepsy
 - Employees with epilepsy will be deemed unfit to work where they may endanger or injure themselves or others in the event of an epileptic attack.
- Eyesight
 - Employees who are blind in one eye will be deemed unfit to work as drivers, if they work with machinery, or in an area where they are likely to sustain an injury to the good eye.
 - People with contact lenses should not work in a dusty environment.
- Hearing
 - Providing an employee can hear sufficiently well so that they may not endanger themselves or others, they will be deemed fit to work.
 - Any pre-existing hearing loss for which the company is not responsible will be recorded, and the employee will acknowledge the audiogram.
- Cardiovascular Disease
 - These include Ischaemic Heart Disease or angina
 - People with these conditions would be unsuitable for jobs with increased levels of physical activity or stress, as well as hot environment work.
- Musculoskeletal
 - For people who will undertake moderate/heavy manual work, e.g. artisans, a medical history will be obtained to establish any back injury or recurrent absence from work due to back pain or sciatica.
 - Examination for full range of movements
 - Bio kinetic assessment where possible
- HIV
 - HIV screening will not be done to establish fitness to work.
- Drug Screening
 - Will comply with the companies Drug and Alcohol Employee Assistance Policy, and Cannabis Policy.
 - The reason for drug screening will be clearly documented. Such reasons might include the safety of the employee, other employees, the public or requirements related to job performance.
 - Written consent for screening and for communication of results to the employer must be obtained prior to screening, as well as the consequences for refusal.

Results of the medical examinations in respect of medical fitness will be communicated to human resources, SHE, Engineers, and other relevant persons required for risk control purposes.

If the person is fit subject to certain conditions, consideration will be given to implement innovative ways of modifying the job. If an employee has been deemed unfit to work, human resources will be required to provide alternative suitable employment for the employee.

Awareness

On a monthly basis, awareness communication will be developed by the occupational and primary health care provider, and will be shared with all employees via notice boards and through online means of communication, either through Sun Talk or via Internal Communications.

Employee Rights

Employees will be informed of the following prior to the medical surveillance taking place:

- The reasons behind the process, and the procedure for medical surveillance.
- Their rights, including but not limited to:
 - To be given the results from their personal medical surveillance;
 - Personal medical results will be treated confidentially at all times, except under the following circumstances:
 - Where issues of public health are at stake. A public health issue refers to situations that may pose a threat to the health or well-being of other employees if the individual results of the surveillance are not given to an Inspector (of Public Health and/or Department of Labour) or to Sun International management;
 - Persons legally required to obtain access to such records without the permission of the employee will be given the relevant access, these can include a Public Health Inspector or a Department of Labour inspector;
 - Human resources, SHE department, Engineers, and other relevant persons required for risk control purposes as biological and biological effect monitoring are a means of assessing the success of control measures and reduction of risk;
 - Discrimination based on medical results will not be permitted;
 - Employees who are seeking compensation for an occupational disease alleged to be caused by the workplace will be informed of the following:
 - Their Line Manager, HR Business Partner, General Manager, and the Department of Labour will be given access to their personal medical records; and
 - The release of their personal medical records to another person will only be allowed upon receiving written consent from the employee.
 - Employees have the right to receive counselling when their medical results are given back to them through the One Sun Wellness programme; and
 - All employees will be issued with an exit medical certificate when they leave the employment of Sun International.
- Testing of an employee to determine their HIV status is strictly voluntary, unless such testing is determined to be justifiable by the Labour Court, in which case the employee will be informed of this requirement.

Record Retention

Medical surveillance records will be maintained by the occupational health service provider, and copies will be given to the Human Resources department in the event that such contract is terminated.

Furthermore, they will be retained in a manner that maintains the commitment to confidentiality outlined above and for the prescribed retention period. Regulations under OHSA require the results of biological monitoring, biological effects monitoring and medical surveillance to be kept for a certain time period, e.g. audiometric tests must be kept for 40 years from the last date of medical surveillance. This includes both hard copies of records, as well as electronic copies, which should be, at a minimum, password protected.

REFERENCES/DOCUMENTS

- Employment Equity Act No 55 of 1998, Section 7
- The Basic Conditions of Employment Act, 75 of 1997
 - a. Code of Good Practice on the Arrangement of Working Time
- Occupational Health and Safety Act 85 of 1993, including the following regulations:
 - a. Hazardous Biological Agents Regulations

- b. Asbestos Regulations
- c. Hazardous Chemical Substances Regulation
- d. Noise-Induced Hearing Loss Regulation
- e. Environmental Regulations for Workplaces
- f. Construction Regulations

MONITORING AND SANCTIONS

This Policy may be subject to monitoring and audits.

Appropriate internal disciplinary action may be instituted against any employee(s) who breach or cause the breaching of this Policy.

IMPLEMENTATION DATE

The implementation date of this Policy is 1 February 2020.

EXCO COMMENTS

FIRST APPROVING EXCO MEMBER

SECOND APPROVING EXCO MEMBER

Signature: 

Signature: 

Name: A.G. JOHNSTON

Name: ANTHONY LEEMING

Designation: GROUP COMPANY SECRETARY

Designation: CHIEF EXECUTIVE

Date: 24 FEBRUARY 2020

Date: 26 FEBRUARY 2020

RACI Matrix [Complete the matrix hereunder to clearly identify roles and responsibilities so as to avoid any confusion]

RESPONSIBILITY FOR CREATION [Clearly state who (position/s) is responsible for crafting (and maintaining) this policy.] Health and Safety Specialist
RESPONSIBILITY FOR IMPLEMENTATION [Clearly state who (position/s) is responsible for implementing this policy, e.g.: Cluster Business Unit HR Manager] Human Resources Business Partners and SHE Managers / Officers
ACCOUNTABILITY [List the person (position/s) who is ultimately accountable for ensuring that the policy is implemented and adhered to, e.g.: Unit GM] General Managers
CONSULTED [List the people (position)/organisations that should be consulted about the policy, e.g.: representative union, SME etc.] Central Office Human Resources and Sustainability
INFORMED [List the people (position)/organisations who needs to be informed about the policy, e.g. Employees, Contractors, Concessionaries, external parties etc.] Representative Union and Employees