

# Fatigue-Risk Management Policy Development

*- A checklist to assist development*



## **Fatigue-Risk Management Policy Checklist**

### **Purpose of a Fatigue-Risk Management Policy**

The purpose of a Fatigue-Risk Management Policy is multi-fold. A fatigue risk management policy acts as an operational policy document in a similar way to policies on drug and alcohol etc. As with other policy writing it also acts as a PROCESS of learning and development for the organisation that is writing and implementing it. It is therefore advisable that each organisation writes its own document based on its local situation. Evidence from other countries indicates that tailoring the policy for specific operations and operators is important to future success.

*The document is called a Fatigue-Risk Management Policy because it is a tool to manage the risk of fatigue.*

What does the policy do?

- Acts as reference for the organisation on what and how to manage situations
- Details exactly what the organisation needs to implement
- Builds commitment across whole organisation to manage fatigue risk
- Engenders a culture that includes fatigue risk as a safety issue in all its actions
- Recognises each organisation will be different and therefore that the policy has to reflect individual differences.

### **Implementation of a Fatigue Risk Management Policy**

Experience from overseas indicates that implementing a Fatigue Risk Management Policy in a modular, isolated form i.e. doing the separate elements one-at-a-time e.g. training, assessing planned hours of work, assessing actual hours of work, is less effective than using an integrated approach where all elements are worked on together. This helps in making sure each element of the system informs other elements so that the policy forms a cohesive, integrated package. For example: training and educating staff about fatigue risk and shiftwork is much more powerful if you can show them the actual hours of work or even the planned hours of work for their particular organisation/team. Similarly, information collected whilst training staff to do a fatigue risk analysis can inform operational procedures with relevant examples of fatigue counter-measures and organisational controls that can be implemented.

In our experience one of the most commonly occurring causes of fatigue in organisations is the hours of work staff actually work. We recommend this as a good starting point to address fatigue issues within your organisation. Whilst we can do our best to eliminate fatigue within an organisation by appropriate roster design, control on overtime and staffing levels etc., it is unlikely fatigue will be eliminated in organisations working extended hours and/or 24/7. It is therefore necessary to then look at ways of minimising the risk of a fatigue related incident occurring. This can be done with the introduction of appropriate controls and counter-measures.

### **Integration with other policies**

Fatigue and the policy to manage fatigue risk should not be viewed as a discreet topic where its impact is seen in isolation and therefore its policy is seen in isolation from other operational policies. Other relevant operational policies (e.g. performance management) need to be checked and cross referenced to make sure policies are not contradictory and/or confusing.



**Proposed Contents - checklist**

	Yes	No	N/A
<b>Introduction – Policy Statement</b>			
Why are you having a Fatigue-Risk policy? Articulate commitment to manage the risks associated with fatigue			
<b>Vision</b>			
What do you hope to achieve by managing fatigue risk in terms of safety and performance?			
<b>The Law/Codes of Practice</b>			
What is your understanding about employers and employees legal responsibility for managing fatigue?			
Identification of relevant codes and regulations			
Is there a process of maintaining awareness of changes/updates in legislation and codes of practice etc?			
<b>Responsibilities</b>			
Include a corporate structure that delineates clear lines of responsibilities for board, management, supervisor and individual employee for each aspect of the policy set out below			
<b>Planned hours of work</b>			
What is the roster pattern and is it fatigue safe?			
Is it a standard of your company to assess any changes in the roster and likely effect on fatigue?			
How do you involve employees in the development and design of rosters?			
What are your consultative procedures with staff to make changes to rosters?			
Do you have fatigue monitoring software like FAID®? If not what alternative mechanisms do you have to measure fatigue in the workplace?			
If using FAID® establish an organisation Fatigue Tolerance Level (FTL)			
<b>Lifestyle Guarantee</b>			
Consider a lifestyle guarantee which is a set of prescriptive limits applied to rostering system designed to provide a degree of predictability to employees off duty to allow for satisfactory social and family life Example <ul style="list-style-type: none"> <li>• Minimum time constituting a rest period</li> <li>• Minimum number of days free of duty per roster period</li> <li>• Maximum number of consecutive work days in a roster period</li> </ul>			



<b>Actual hours of work</b>			
How do you monitor the effects of Actual hours of Work on fatigue levels? In other words what are the effects of call outs, seasons; shift swops on the planned hours of work i.e. the roster's predicted fatigue levels.			
Is there a system to record actual hours of work and when they occur within the 24 hour cycle (i.e. start and end times of each shift)			
Do you have a fitness for duty procedure which includes assessment for fatigue – what is it?			
Do you use fatigue monitoring software (like FAID®) to monitor actual hours of work?			
If using FAID® establish an organisation Fatigue Tolerance Level (FTL)			
<b>Fatigue Related Risk Management</b>			
Identify what are the fatigue risk related hazards? (Start by identifying the top ten).			
Review job design – see if high risk tasks can be moved to less risky periods within the 24 hr cycle or shift sequence			
What are the appropriate risk minimising actions? Undertake risk assessment to determine acceptable fatigue scores			
Identification of strategies to manage contingency situations requiring extension of work periods e.g. establishment of limits, limiting the number of times extra hours can be worked, ensuring specific duties are ascribed after extra hours worked, limiting availability of employee to work for future rostering following extra hours			
Organisation needs to list measures it takes to minimise onset of fatigue or mitigate effects of fatigue Examples <ul style="list-style-type: none"> <li>• Provision sleep/rest facilities</li> <li>• Power napping</li> <li>• Rules for getting people home after shift (transport provision)</li> <li>• Availability of catering</li> <li>• Other alerter strategies</li> </ul>			
<b>Training</b>			
What training is provided? (e.g. workshops /literature) for - <ul style="list-style-type: none"> <li>- new shiftworkers</li> <li>- existing shiftworkers</li> <li>- supervisors (how to recognise and what to do with a fatigued worker)</li> <li>- managers</li> </ul>			
What support materials are provided – written information to take away etc.			
Refresher training – how often			
Is the training competency based and is knowledge tested regularly – how is this done?			
Access to resources including training for family members considered?			



<b>New employees</b>			
What are you going to ask new employees about managing fatigue/shiftwork etc?			
What assessment tools or interview questions will you use as standard to assess suitability for shiftwork/extended hours working?			
What induction / training are you going to give them on managing fatigue/shiftwork?			
<b>Managing existing workers that may not be coping well</b>			
What happens to people who are too fatigued to work safely and how do you make that decision? <ul style="list-style-type: none"> <li>• Who makes the decision?</li> <li>• Are any assessment tools used?</li> <li>• What happens to staff that have this happen frequently?</li> <li>• What support mechanisms exist for staff?</li> </ul>			
What happens if a worker is caught sleeping on the job?			
Is power napping at work sanctioned?			
<b>EAP and monitoring of general health of existing employees</b>			
What is included about managing fatigue and shift work in annual health check-up?			
Do you screen for sleeping disorders?			
Do you monitor prevalence of health issues that occur more frequently with shiftworkers (digestive conditions, heart disease, stroke, depression, obesity, diabetes, cancer, specific women's health issues etc)?			
<b>Exiting workers</b>			
What will you ask exiting workers about hours of work/fatigue/shifts?			
<b>Independent Contractors</b>			
What system do they have in place to manage fatigue?			
Consider including them within your training and other aspects of the policy if they do not have their own system			
<b>Accidents/Incidents</b>			
Is information relating to fatigue collected for ALL accidents/incidents so an assessment can be made as to whether fatigue was a contributory factor?			
What questions are asked after an accident/incident?			
What records are kept?			
Are any assessments used to assess fatigue level – what are they?			
<b>Absenteeism &amp; Sickness</b>			
What questions are asked in relation to absenteeism?			
What questions are asked in relation to high sick rates?			
What records are kept?			



<b>Monitoring, Audit and Review</b>			
Describe how, when and exactly what will be monitored as part of this policy for all the different aspects e.g. hours of work, training,			
Is there a procedure to deal with any adverse trends identified?			
Instances of non-compliance and what was done			
Identify what documentary system is required to show these things have been completed (i.e. the paper trail of evidence)			
How long do you need to keep the documentary evidence for yourselves and external regulators?			
Board level review of operation of policy			
<b>Maintenance of Policy</b>			
Input from employee representatives and independent professionals			
How often and when is this policy reviewed?			
Version control of this policy document etc. i.e. date developed, and due to be reviewed etc.			

