

## Fatigue Management Procedure

### Purpose

Skillset Limited ('Skillset') has a duty under the NSW Work Health and Safety Act and Regulations 2011 (the 'Legislation') to prevent and/or to minimise fatigue in the workplace, as far as reasonably practicable. Skillset aims to achieve this through consultation and risk management.

### Commencement of Procedure

This Procedure will commence from 01/05/2017. It replaces all other fatigue management procedures of Skillset (whether written or not).

### Application of Procedure

This Procedure applies to workers (employees, agents, contractors (including temporary contractors as otherwise defined under WHS legislation) of Skillset, collectively referred to in this procedure as workers.

### What is fatigue?

Fatigue may be a serious risk to the health and safety of all workers. Fatigue is an acute, ongoing state of tiredness that leads to mental or physical exhaustion and prevents people from functioning within normal boundaries. It is more than feeling tired and drowsy, it is a physical condition that can occur when a person's physical or mental limits are reached. Fatigue may include feeling sleepy, physically or mentally tired, weary or drowsy, feeling exhausted or lacking energy.

Fatigue prevents a person from being able to function normally. It decreases alertness and affects a person's ability to think clearly, thereby increasing the potential for accidents or injury.

### Who is responsible for managing fatigue?

Fatigue management is a shared responsibility between Skillset (PCBU), workers and other persons conducting a business or undertaking ('PCBUs') affecting or connected with Skillset's workplaces, as it involves factors that occur both in and outside of the workplace.

Workers are reminded that they are required under the Legislation to take reasonable care for their own health and safety as well as that of others at the Company's workplace.

### What factors may lead to fatigue?

There are a number of different factors which may contribute to fatigue, lack of sleep being the most common. These factors may arise from the workplace, from a person's lifestyle, or a combination of both.

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Workplace and environmental factors

Some key factors related to the workplace which may contribute to fatigue include, but are not limited to:

- (i) Workloads
- (ii) Work-related travel

This includes timeframes, deadlines and work completed outside normal hours.

- (iii) Shift work

One of the main groups of workers at risk from fatigue are shift workers, in particular night shift workers. Disruption to sleep patterns is the most common cause of fatigue. Sleep periods are shorter after working a night shift or if starting work before 7am. The level of tiredness tends to increase during the second half of the shift, especially between 2am-6am and 2pm-4pm.

- (iv) Scheduling and planning

For example: roster patterns, length and time of shifts worked, number of consecutive night shifts. Work should be scheduled to allow time for recovery time and for leisure time.

The time of day (or night) work is performed and the number of hours worked in a working shift can impact on the risk of fatigue. Working at times when workers are biologically programmed to sleep and working for long periods of time can contribute to fatigue.

- previous hours and days worked;
- time of day or night worked;
- inadequate work breaks;
- lengthy periods of time without sleep;
- payment incentives that may lead to working longer shifts;
- type of work being performed: physically or mentally demanding; repetitive or monotonous in nature;
- workplace conditions (e.g. light, noise, climate, workstation design);
- a company's culture (e.g. a culture of working long hours; lack of flexible work practices; incentive schemes and lack of training or information);

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- Commuting hours to and from work. At times, transportation to workers' homes will be available based on an assessment by the Manager on duty.

The PCBU will consider the above factors in its management of fatigue.

#### Lifestyle factors

Some lifestyle factors which may contribute to fatigue are:

- social life
- family responsibilities
- inadequate sleep due to sleep disorders
- general health (including diet, exercise, illness)

Workers are required, as far as reasonably practicable, to ensure that their lifestyle does not increase the risk of fatigue at the workplace.

#### What are the indicators of fatigue?

A person may exhibit various signs which indicate that they may be fatigued. It is important to identify these signs. Some examples may be:

- a lack of alertness;
- lack of concentration; daydreaming;
- low motivation;
- slowed reflexes and responses;
- poor judgement or poor memory;
- making more mistakes than usual;
- drowsiness, or falling asleep, at work (including micro sleeps);
- finding it difficult to keep the eyes open;
- needing more sleep than usual during days off work;
- not feeling refreshed after sleep;
- excessive head nodding or yawning;
- blurred vision;
- mood changes, increased irritability or other changes to the person's mental health.
- changes to the person's general health or fitness

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### Managing fatigue in the workplace

To effectively manage fatigue the PCBU will adopt the following strategies: -

Identify contributing factors of fatigue

The PCBU will identify all reasonably foreseeable hazards that could contribute to fatigue.

When undertaking a risk identification process in the workplace, the PCBU may need to consider the following factors when applying the Company's Risk Management Procedure:

- Working time
- Breaks during working time
- Rostering
- Shift work
- Night work
- On-call and call back work
- Seasonal work
- Fly-in, fly-out work (FIFO)
- Leave management
- Absenteeism
- Emergencies and unexpected events

The identification process may involve inspecting work rosters; examining records to determine if excessive hours have been worked, or the times at which work has been performed; observing work practices and systems of work, consultation with workplace participants and health and safety representatives; internal reviews; analysis of incident reports and workplace surveys and obtaining information on fatigue from materials and data published by industry associations, regulators, unions and other sources.

The Legislation requires that as a PCBU, Skillset must consult with workers carrying out work who are or likely to be affected by fatigue factor identified as a risk. If there are health and safety representatives on site, then they must be involved in the consultation.

Consultation must occur in the following instances:

- When fatigue is identified as a hazard in the workplace;
- When the PCBU is reviewing its management procedures for fatigue;
- When the PCBU introduces new, or alters existing hours of work, work schedules and working procedures;
- Where there are indications that fatigue is affecting the health and safety of workers; and
- If an incident, or near miss, occurs.

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#### Assess the contributing factors identified

As part of the risk management process, the PCBU will assess the likelihood of a risk of injury from the fatigue factors it has identified. The PCBU will consider which workers are at risk, where they are located and how are likely to be affected and the seriousness of the potential harm, if it should occur.

The assessment process may involve consulting with industry associations concerned with similar workplaces; consulting with at risk workers and health and safety representatives regarding workloads and schedules; comparing planned working hours to those actually worked and reviewing workplace incident reports.

The aim of any risk assessment should be to reveal the likelihood of the identified risk occurring and to identify the affected workplace participants. Applying this to a review of incident reports, the following questions could be asked:

- What is the likelihood that fatigue is contributing to the incidents?
- What time of day do the incidents occur?
- How long had the workers been working when the incident occurred?

#### Decide, agree and implement appropriate risk control measures

Skillset will, as far as reasonably practicable, eliminate the factors that contribute to fatigue. If this is not reasonably practicable then Skillset will adopt the risk control measures based on the hierarchy of hazard control [see the Skillset's Risk Management Procedure].

When deciding on control measures to implement, refer to any relevant codes of practice or guidelines.

#### Training Program

Skillset will provide information on fatigue management to all workers at Induction. In addition to this Procedure, the information will cover:

- the health and safety responsibilities of everyone in the workplace;
- risk factors for fatigue;
- symptoms of fatigue;
- potential health and safety effects of fatigue;
- effective control measures for fatigue, for example, scheduling shift work;
- procedures for preventing fatigue, for example, incident reporting procedures;
- effects of medication, drugs and alcohol;
- diet and general health issue relating to fatigue;

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- balancing work-life and personal life.

**Driving**

Workers should be aware of the effects of fatigue when driving to and from work or as part of their work activities. Precautions whilst driving include:

- taking regular and adequate rest breaks, for example, taking breaks every two hours;
- stopping when tired;
- planning the journey, taking into consideration pre-journey work duties, the length of the trip and post-journey commitments; and
- staying overnight if driving time and non-driving duties exceed 11 hours in one day, unless driving duties can be shared.

**Review**

This procedure will be reviewed annually during the WHS Audit Program, through consultation with workers and health and safety representatives, and when legislative requirements change or in the event of a serious occurrence where fatigue is factor.

**Breach of this Procedure**

All Workers must comply with this procedure at all times. If a worker breaches this procedure, they may be subjected to disciplinary action including termination of employment. Agents and contractors (including sub-contractors and temporary contractors) may have their contracts with Skillset terminated or not renewed.

**Variations**

Skillset reserves the right to vary, replace or terminate this Procedure from time to time.

**Associated Documents**

- WHS Policy
- Fatigue Management Policy
- Fatigue Management Checklist

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