

Fatigue Management in NSW Health Workplaces

Summary This Guideline provides a risk management approach for managing work related fatigue. It includes guidance on identifying areas at increased risk for work-related fatigue, assessing the Work Health and Safety related issues and providing strategies to eliminate work related fatigue as much as possible or to minimise its impact where it cannot be eliminated.

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Fatigue Management in NSW Health Workplaces

GUIDELINE SUMMARY

This Guideline provides a risk management approach for managing work related fatigue. It includes guidance on identifying areas at increased risk for work-related fatigue, assessing the Work Health and Safety (WHS) related issues and providing strategies to eliminate work related fatigue as far as possible or to minimise its impact where it cannot be eliminated.

This Guideline is to be read in conjunction with NSW Health Policy Directive *Work Health and Safety: Better Practice Procedures* ([PD2018_013](#)) which outlines strategies that agencies can adopt to manage their hazards and health and safety risks.

KEY PRINCIPLES

NSW Health Agencies should imbed a safety culture throughout all levels of the organisation with a clear understanding of the responsibilities and accountabilities for officers (including Chief Executives and Boards), managers and workers in contributing to fatigue management.

Chief Executives must ensure risks related to fatigue are identified, assessed and controlled within their health organisation. The risks associated with fatigue must also be monitored and reviewed regularly in consultation with workers to ensure that controls are being implemented and are effective.

Managers must ensure that fatigue risks in their work area are identified and controlled. They must consult with workers about fatigue risk and how it is managed, make them aware of any risk and provide relevant information, supervision and training to assist with managing this risk.

Workers must report any fatigue related issues, incidents and follow procedures to reduce any fatigue risk in their workplace. Workers and managers need to be provided with information, training, instruction and supervision on fatigue including their Work Health and Safety (WHS) obligations.

Fatigue is often caused by several interrelated factors that can be cumulative. It can occur because of prolonged mental or physical activity, sleep loss and/or disruption to the internal body clock without sufficient time to rest and recover. Effective management of fatigue risk starts with identifying foreseeable factors including psychosocial risk factors in the workplace.

Areas that can contribute to fatigue hazards include work schedules and planning, job demands, sleep quality and length, environmental conditions and non-work-related factors. It is essential that workers are consulted when identifying, assessing and controlling fatigue risk to encourage everyone to work together and raise awareness about how to manage risks associated with fatigue.

Fatigue risk assessments can be performed in advance based on scheduled rosters and work information. Individual worker fatigue checklists/ assessments maybe used to look at

how a worker’s level of fatigue may impact health and safety. This could occur ad hoc when a worker looks to be displaying signs of fatigue or after working additional hours that may have disrupted the internal body clock or limited rest and recovery. Fatigue assessments can also occur systematically at shift start, handover process or when safety critical tasks are to be performed (such as long-distance driving). It is important all safety critical tasks which could be impacted by fatigue are identified and assessed, so appropriate controls can be implemented.

A range of management strategies and options exist to assist in minimising the likelihood and potential consequences of work-related fatigue. Where fatigue risks cannot be eliminated, controls must be implemented to minimise work-related fatigue to the lowest level reasonably practicable.

Ongoing evaluation and review of fatigue risk controls will identify areas for improvement, gaps in administration systems and causes of any systems failures.

Data is to be monitored to identify trends and emerging risks related to fatigue. This can include identifying lag and lead indicators which can be reported, shared and monitored locally and at governance levels of the organisation for system improvement.

REVISION HISTORY

| Version | Approved By | Amendment Notes |
|-----------------------------|--|--|
| GL2023_012 April-2023 | Deputy Secretary, People, Culture and Governance | Updated with the provisions under the <i>Work Health and Safety Act 2011</i> (NSW) and <i>Work Health and Safety Regulations 2017</i> (NSW) which include: <ul style="list-style-type: none"> • Providing a risk management approach to eliminating and if not practicable, minimising fatigue in the workplace • Providing information for executives, managers and workers on their roles and responsibilities including training/ instruction on fatigue management • Provides additional Supporting Resources to assist implementation. |
| GL2007_023 December-2007 | Director-General | New Guideline |

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1. BACKGROUND

In a work context, fatigue is a state of mental and/or physical exhaustion which reduces a person’s ability to perform work safely and effectively. It can occur because of prolonged mental or physical activity, sleep loss and/or disruption to the internal body clock without sufficient time to rest and recover.

Fatigue can be caused by factors which maybe work related, non-work related or a combination of which accumulate over time.

Lifestyle and personal choices can increase or reduce the experience of fatigue in the workplace. Workers must be aware of this relationship and understand their role in managing fatigue.

The NSW Health system employs a diverse range of workers who have demanding roles and carry a high level of responsibility requiring long hours and shift work.

Fatigue can adversely affect safety in the workplace. It reduces alertness, which may lead to errors and an increase in incidents and injuries, particularly when:

- Operating equipment, including driving vehicles
- Undertaking critical tasks that require a high level of concentration
- Undertaking night or shift work.

When workers are fatigued, they may be more likely to exercise poor judgement and have slower reactions. Fatigue can affect both physical and mental health. Fatigue can contribute to the impact of role overload in the workplace and needs to be considered in conjunction with other psychosocial hazards.

The following table provides a summary of common causes of fatigue that may need to be considered during the management of risks associated with fatigue.

Table 1. Work and Non-Work-Related Causes of Fatigue

| Work Related | Causes Outside Work |
|---|---|
| Roster patterns including on call | Poor quality of sleep |
| Length of shifts | Sleep loss |
| Inadequate work scheduling and planning | Social life |
| Length of time worked, including overtime | Family needs and commitments |
| Timing of shifts (such as night shift) proportionally increases the impact of fatigue | Other employment outside the primary workplace |
| Insufficient recovery time between shifts | Travel time |
| Long periods of time awake | Sleep disorders |
| Harsh environmental conditions | Poor nutrition/ diet |
| Type of work being undertaken | Inappropriate use of alcohol, medication or illicit drugs |

| Work Related | Causes Outside Work |
|--|---|
| Mentally or physically demanding work | Personal health issues (such as sleep apnoea, sleep disorder) |
| Repetitive tasks or tasks that are not stimulating | |
| Inadequate rest breaks | |
| Driving for over 2 hours | |
| Prolonged use of Personal Protective Equipment | |
| Vicarious trauma and exposure to violence and trauma | |

1.1. About this document

This document provides guidance for NSW Health organisations to apply a risk management approach for identifying and managing work-related fatigue. NSW Health organisations have a Work Health and Safety (WHS) duty to prevent and manage workplace fatigue by identifying, assessing, controlling and reviewing fatigue risks in consultation with workers. Fatigue needs to be managed in an integrated and proactive manner to provide safe systems of work' and a safe environment.

1.2. Key definitions

| | |
|---|---|
| Isolated Worker | Worker that is isolated from the assistance of other persons because of the location, time or nature of the work. |
| NSW Health Organisation | Throughout this document the term NSW Health organisation is used to mean all public health organisations and all other bodies and organisations under the control and direction of the Minister for Health or the Secretary of Health. |
| Other Persons | Include patients, consumers, clients, customers, sales representatives and visitors entering or utilising the public health organisation's workplaces. |
| Person conducting a business or undertaking (PCBU) | Under the <i>Work Health and Safety Act 2011</i> (NSW), NSW Health organisations are PCBUs and are responsible for the primary duty of care for workplace health and safety, as far as is reasonably practicable. |
| Safety Critical Task | Safety critical tasks are those where the consequences of a mistake or error in judgment could cause serious injury. ¹ |

¹ SafeWork Australia Guide for managing the risk of fatigue at work November 2013

| | |
|-----------------------------|---|
| <p>Sleep Hygiene</p> | <p>Refers to the various habits, environmental factors, and practices that may influence the length and quality of a person's sleep.</p> |
| <p>Worker</p> | <p>Anyone who carries out work for NSW Health is given the legal status of 'worker', workers include:</p> <ul style="list-style-type: none"> • Employees • Contractors, including Visiting Practitioners • Sub-contractors • Sub-contractors and employees of contractors • Employees of a labour hire company e.g., Agency staff • Volunteers • Apprentices, cadets or trainees • Students on clinical, work experience or other placements. |

1.3. Legal and legislative framework

The *Work Health and Safety Act 2011* (NSW) [WHS Act] and *Work Health and Safety Regulation 2017* (NSW) [WHS Regulation] is designed to ensure the health and safety of everyone at the workplace. NSW Health organisations have a **primary duty of care** (Section 19 WHS Act) to ensure, so far as is reasonably practicable, that workers and other persons (such as visitors) are not exposed to a risk to their health and safety. They must also ensure meaningful consultation about WHS with workers, health and safety representatives and health and safety committees.

Workers also have a legal duty to take reasonable care for their own health and safety and the health and safety of others in the workplace. Workers have a duty to follow procedures and cooperate to comply with reasonable instructions given by the NSW Health organisation.

For further information in relation to the WHS Act and duties refer to the NSW Health Policy Directive *Work Health and Safety: Better Practice Procedures* ([PD2018_013](#)) or the [SafeWork NSW website](#).

[SafeWork Australia](#) also provides guidance on how to manage the risk of fatigue at work.

[WorkSafe Queensland](#) have resources and guidance on preventing and managing fatigue-related risk in the workplace.

[WorkSafe Victoria](#) also provides information on work-related fatigue.

Fatigue can contribute to psychosocial risk factors in the workplace and SafeWork NSW [Code of Practice: Managing psychosocial hazards at work](#) provides guidance for a systematic process to manage psychological hazards and risks.

In addition, the NSW Health Policy Directive *NSW Health Code of Conduct* ([PD2015_049](#)). requires workers to present themselves for work in a fit and proper condition and not enter

outside work commitments that might adversely affect work performance or the safety of themselves, their colleagues, patients or the public.

The NSW Health Policy Directive *Leave Matters for the NSW Health Services* ([PD2023_006](#)) provides information on the various leave arrangements available to workers and how leave is to be managed.

NSW Health organisations are to ensure that any personal information is handled according to relevant legislation and in accordance with the [NSW Health Privacy Manual for Health Information](#) Section 7 *Collecting personal health information*.

1.4. Responsibilities

1.4.1. Chief Executives/ Officers

Chief Executives and Officers must exercise due diligence to ensure the business complies with work health and safety duties and obligations. They need to take reasonable steps to:

- Acquire and keep up-to-date knowledge of fatigue-related matters
- Gain an understanding of the nature of the operations and fatigue-related hazards and risks associated with those operations in a health care environment
- Ensure the availability of appropriate resources and processes to identify and manage fatigue-related risks
- Ensure appropriate processes for receiving and considering information regarding incidents, hazards and risks and responding in a timely way to that information
- Verifying the provision and use of the resources and processes
- Ensure adequate consultation arrangements in the NSW Health organisation.

1.4.2. Managers

Managers must ensure fatigue risks within their area of responsibility are identified, assessed and recorded. They must ensure to implement reasonable controls to eliminate the risk of fatigue and if not possible reduce the risk by, managing, monitoring and reviewing controls to ensure effectiveness. This includes communicating within established reporting structures. Steps to achieve this include:

- Assessing and recording fatigue related hazards and risks in consultation with workers
- Identifying and providing appropriate resources to support effective management of fatigue related risks and review the effectiveness of these controls
- Encouraging a just safety culture to manage fatigue related risk effectively
- Supporting the self-assessment and reporting of fatigue by workers
- Ensuring fatigue incidents are reported via the relevant incident reporting system
- Advising executive management of barriers preventing the reduction of fatigue risks to a level that is reasonably practicable

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- Ensuring workers are aware of fatigue risk management principles
 - Facilitating fatigue management training for themselves and those they manage.

1.4.3. Workers

Workers must take reasonable care for their own health and safety and not adversely affect the health and safety of others. They must also cooperate with reasonable instructions, policy or procedure related to fatigue in the workplace including:

- Identifying, reporting and responding to actual and potential fatigue risks
- Assessing their fitness for work and not undertake work if fatigue risk cannot be managed appropriately and reporting to their supervisor
- Looking out for signs of fatigue in colleagues including physical, mental and emotional symptoms (see resource Fatigue Management - Worker and Manager information sheet)
- Declaring any secondary employment for approval
- Reporting work undertaken outside of rostered hours at primary place of employment that is likely to increase risk of fatigue.
- Undertaking fatigue risk management training as directed.

2. RISK MANAGEMENT APPROACH TO FATIGUE

NSW Health organisations are to have a commitment to fatigue management to control the risks to health and safety of workers. This includes embedding a safety culture throughout all levels of a NSW Health organisation with a clear understanding of the responsibilities for officers, managers and workers in contributing to fatigue management.

Managers are to use a risk management process to identify and manage the risks associated with fatigue. This involves the following steps:

1. Identifying factors that may cause fatigue
2. Assessing the risk of these hazards
3. Implementing and maintaining risk control measures
4. Monitoring and reviewing the effectiveness of the control measures.

When undertaking the risk assessment, it is important that workers (including representatives such as Health and Safety Representatives (HSR)) are consulted at each step in the process. This encourages everyone to work together to identify fatigue risk factors and implement effective control measures. Consultation also helps to raise awareness about the risks associated with fatigue.

2.1. Identifying factors that may cause fatigue

Effective management of fatigue risk starts with identifying foreseeable factors including psychosocial risk factors that could contribute to fatigue. Fatigue is often caused by a number

of interrelated factors that can be cumulative. Common factors that may contribute to fatigue are:

| | |
|------------------------------------|---|
| Work schedules and planning | Limits the time workers can physically and mentally recover from work. This may include workers who undertake regular shift work, night work, work extended hours or who are not able to take regular breaks or are always connected using technology. It also includes workers that are remote or work in isolation. |
| Job demands (role overload) | Particularly work that requires extended periods of work that is physically or mentally demanding. This also includes work that is monotonous, repetitive or cognitively difficult or requires rapid changes between tasks. Also need to consider other psychosocial risk factors (see other work-related factors). |
| Sleep | Includes the length of sleep time, quality of sleep and time since sleep. |
| Environmental conditions | Exposure to heat, cold, vibration or noise, can make workers tire quicker and may impair performance. |
| Other work-related factors | Psychosocial risks including violence and trauma, low job control role conflict or lack of role clarity, poor managerial support, poor co-worker support, bullying, harassment, poor procedural fairness and poor change management. |
| Non-work-related factors | Such as lifestyle, other work commitments, family responsibilities or personal health factors. |

Methods and resources that can be used to identify whether there are any of the above risk factors affecting workers include:

- Using the [Fatigue Identification Checklist](#) in supporting resources or refer to [SafeWork Australia](#) or WorkSafe Queensland fatigue resources
- Consulting with workers
- Examining work practices and systems of work (particularly for safety critical tasks)
- Examining shift arrangements, rosters and hours worked, including overtime and roster changes at short notice
- Checking staff establishment numbers for the workload
- Attendance and leave records
- Data collected via the nursing workloads monitoring system or other available workload monitoring systems (such as Junior Medical Officer Overtime Dashboard)
- Incident data and the findings of incident investigations
- Industrial issues, complaints or grievances citing fatigue
- Worker and/or patient complaints
- Workplace injury records
- Human Resource data such as unplanned absenteeism, staff turnover and workers compensation claims.

2.2. Assessing the risk of fatigue

A risk assessment involves considering what could happen if someone is exposed to a hazard, the degree of harm and the likelihood of it happening. Once factors that may cause fatigue are identified, an assessment is to be undertaken to consider:

- Where, which and how many workers are likely to be at risk of becoming fatigued
- How often fatigue is likely to occur
- The degree of harm that may result from fatigue, such as safety critical tasks
- Whether existing control measures are effective
- What action must be taken to control the risk of fatigue
- How urgently action to control the risk needs to be taken.

Fatigue risk assessments can be performed in advance based on scheduled rosters and work information. Fatigue checklists/ assessments for an individual worker can be used to examine how a worker's level of fatigue may impact their health and safety. The assessment can include the likelihood for worker fatigue such as sleep opportunity (how much sleep a worker can have), prior sleep wake behaviour (how much sleep the worker has had) and behavioural symptoms of fatigue (is the worker feeling fatigued).

Real time individual worker fatigue risk assessments may occur ad hoc when a worker appears to be displaying signs and symptoms of fatigue or self-reports a fatigue risk.

Also, a risk assessment can be completed after working additional hours that may have disrupted the internal body clock or limited rest and recovery. They can be conducted daily, at the start of a shift or at handover between shifts for early identification of worker fatigue. They can also occur when safety critical tasks are to be performed (such as long-distance driving).

Examples of individual 'real time' fatigue checklist assessment tools are in Section 5 Supporting Resources *Individual Fatigue Identification Checklist and Workplace Safety Plan*.

Information to inform risk assessment could include:

- A risk matrix can be used to determine the likelihood of fatigue and the potential consequence with a fatigue related error to determine if further controls are required
- Using the supporting resource [Fatigue Control Chart](#) to look systematically at factors that may contribute to fatigue in the workplace to determine the likelihood of fatigue. It includes a table with a risk indicator for fatigue (lower to higher risk)
- Consulting workers on workloads and schedules
- Analysing audits of working hours, including compared planned working hours with actual hours worked. Where appropriate, consider work-related travel and work completed outside of normal hours (shift work and night work)
- Reviewing workplace incident data and adverse events regarding factors potentially related to fatigue hazards

- Checking whether workers have had accidents travelling home or on work-related journeys
- Considering other psychosocial hazards and the contribution of these hazards to the risk of fatigue
- Implementing a “real time” system for workers to self-assess their fatigue levels to ensure fitness to work. This would include processes for workers, colleagues, and managers to identify sleep opportunity and sleep/ wake behaviour and recognise fatigue symptoms with agreed controls to manage different levels of fatigue on a day-to-day basis
- Identify safety critical tasks that workers perform that may have significantly adverse outcomes in the event of fatigue related error including microsleeps, poor decision making and slow reaction times.

2.3. Controlling the risk of fatigue

A range of management strategies and options exist that assist in minimising the likelihood and potential consequences of work-related fatigue occurring. Controls should be implemented based on the principles of the hierarchy of controls. Where fatigue is identified, controls must be implemented to eliminate fatigue so as far as reasonably practicable.

Where fatigue cannot be eliminated controls must be implemented to minimise work-related fatigue to the lowest level reasonably practicable.

The likelihood of fatigue and potential consequences for workers performing safety critical tasks must be considered and controlled as far as reasonably practicable.

2.3.1. Shift and rostering design

Rostering and shift design can minimise fatigue in the workplace by applying rostering best practice principles. This includes using a forward shift rotation (such as starting times moving from morning to afternoon to night-time) and maximising breaks between shifts and before rotating workers to a new shift.

Implementing rosters with safe working hours needs to consider if staff are working night shifts. Also, the travel time and mode of transport to and from work should be considered. Minimising the number of consecutive night shifts and making sure that periods of extended work hours are also followed by an appropriate recovery time before resuming work. It's important to avoid overtime allocation after afternoon or night shifts, especially after 10-hour or 12-hour night shifts.

Roster design and creation must include engaging and consulting with workers. Rosters are to reflect an appropriate skill mix by ensuring staffing establishments are sufficient to carry out the work required. Staffing establishments should be sufficient as far as reasonably practicable to keep overtime to a minimum and allow flexible work arrangements, if possible, based on organisational needs.

Other considerations include:

- Monitoring and managing secondary employment to ensure total hours worked do not impact on an individual's fatigue

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- Consulting with educational institutions to ensure there is shared opportunities to identify and address worker fatigue
 - Use tools in the eHealth application HealthRoster to manage fatigue including roster alerts and apply rostering best practice principles.

2.3.2. Leave management

Managing leave arrangements can contribute to minimising fatigue in the workplace. Service delivery needs and the impact on workers must be considered and managed when planning rosters and approving leave. Ensuring there are processes in place for reducing/ minimising excessive annual leave can assist. Areas to consider include:

- Processes for managing and monitoring rosters and leave are linked. The same manager is to be responsible for rosters (and changes to rosters, including shift swapping) and for approving leave. For example, if the nursing unit manager rosters nursing staff, they must also be responsible for approving leave for the same group of nursing staff.
- All requests and approvals for leave or changes to rosters are in writing
- Rosters reflect approved leave
- Reasonable leave requests are approved.

To minimise fatigue during a shift the following needs to be considered:

- Sufficient workers are made available to fill a roster
- Alternate arrangements to cover a roster are made as required
- A relief pool is maintained in high demand areas, if possible
- An appropriate number of on call workers can be accessed for unplanned leave, emergencies or where workload increases
- Appropriate rest and nutrition breaks are provided and taken during long or extended hours of work with the manager/ supervisor consulting with the worker and considering the relevant award arrangements
- Vacant positions as far as reasonably practicable are filled in a timely manner based on availability of suitable workers.

It is important to have processes to monitor actual time worked against scheduled hours worked to identify possible issues with excessive hours worked. This can allow early identification of potential fatigue hazards in the workplace.

2.3.3. Job demands

Work and task level factors such as high or low job demands, role clarity, control, and conflict and physically and mentally demanding work involving heavy, repetitive or prolonged manual handling impacts on the job demands. By applying good workplace design principles, the impact of fatigue due to job demands could be reduced. For further information refer to SafeWork Australia's [Principles of Good Work Design](#).

Consideration of fatigue hazards are to be incorporated when designing the work environment (tools/ equipment/ layout) and work processes.

It is also important there are systems to identify, reduce and support workers exposed to violence and trauma.

2.3.4. Work environment issues

Factors that need to be considered in the work environment that contribute to fatigue are:

- Avoid working during periods of extreme temperature without additional controls including job rotation to minimise the exposure time
- Providing a cool area where workers can take a rest break and rehydrate in hot work environments
- Checking workers have access to food outlets/ services that offer nutritious food options
- Ensuring a process is in place to allow workers to rest before travelling after extra-long or extended shifts, particularly when finishing shift work. This could include travel vouchers, rest accommodation etc.
- Ensuring sufficient time is allocated to allow safe travel between facilities
- Consideration if a worker is working remotely or in an isolated environment
- Ensure there is adequate lighting for the task and appropriate exposure to natural light at the times that assist to calibrate the body's internal clock (circadian rhythm)
- The physical job demands such as exposure to noise, hazardous manual tasks including vibration, ventilation of an area are identified and controlled.

2.3.5. Worker support

The following worker support strategies can be available to assist in reducing and managing the impact of fatigue:

- Workers are to be aware of policies, procedures and expectations regarding rostering and leave
- Workplace grievances are dealt with in an appropriate and timely manner
- Workers have access to support services, such as Employee Assistance Programs (EAP), wellbeing programs and additional education for managing shift work
- Workers have an agreed mechanism for raising concerns about work-related fatigue that encourages early identification of potential issues. This may include discussions at handover or with the manager and entering an incident into the incident management system (ims+)
- Workers have training on signs and symptoms of fatigue, how to report a fatigue issue, and how to improve sleep hygiene

- Workers are encouraged to monitor personal level of fatigue and speak up if they have concerns for their fitness for work including a process to manage fatigue once identified
- Co-workers are encouraged to monitor each other for symptoms of fatigue based on a 'no blame' safety culture
- Managers are provided with appropriate training to assist them to prevent and manage work-related fatigue
- Managers actively promote good work life balance and discourage long working hours, particularly when workers, work offsite.

Procedures to manage fatigued workers, including what will happen if they are too fatigued to continue to work are documented and implemented. Where levels of fatigue have been identified, control measures based on the level of individual fatigue-related risk could include:

| | |
|----------------------|---|
| Low Risk | No additional controls required. |
| Moderate Risk | Self-management strategies (such as rostered breaks, task rotation, nutrition and water, self-pacing, caffeine). |
| High Risk | Supervisory and team management strategies in addition to self-management (such as increased supervision by manager and co-workers, alternate duties (task reassignment), additional rest breaks, consider safe options to travel home or additional rest prior to travelling). |
| Extreme Risk | Where extreme fatigue risk has been identified, work must not be performed and a safe option to travel from the workplace implemented. |

2.3.6. Driver fatigue

NSW Health organisations must ensure that risk associated with driving and fatigue are eliminated or where that is not practicable, they are minimised.

The geographical size of Health Services, particularly in rural areas, can mean that workers are required to spend considerable time driving between facilities. Factors such as poorly lit and/or poorly maintained roads, adverse weather conditions, hours already worked and hours behind the wheel all increase the risks associated with driver fatigue.

While specific strategies to manage risks associated with driver fatigue will depend on individual circumstances, options may include:

- Greater use of teleconferencing and videoconferencing
- Using fleet vehicles whenever possible
- Sharing vehicles so driving duties can be shared
- Workers who are driving take rest breaks every 2 hours
- Providing overnight accommodation for early morning or late finishing meetings and long-distance patient escorts where there is a significant drive home or back to base
- Use of technology on vehicles to assist safety

For workers that drive for work, their place of residence must be considered when looking at the hours driven. Workers must not be prevented from using toll roads if they are a direct and safer route to the destination.

Workers are to self-assess fatigue prior to long distance driving (see Section 5 Supporting Resources for the *Individual Fatigue Self Reporting Checklist and Workplace Safety Plan*).

2.3.7. Technology

Workers can be at risk of always being connected to work through technology such as mobile phones and emails. It is important to assess whether workers are always connected using technology and not taking necessary rest breaks. Managers should actively promote good work/ life balance and discourage working long hours, particularly with workers working from home who have 24 hour access to their work. If identified as an issue, strategies need to be implemented to manage potential fatigue associated with being always connected. Options may include:

- Monitor on-call arrangements and roster patterns to ensure safe working hours
- Ensure workers are encouraged to have adequate break times according to their award
- Implement agreed strategies based on time management principles to respond to emails, calls etc.
- Managers monitor fatigue and workload by checking in with workers
- Calls are only escalated in an emergency to a worker on leave or days off
- Workers are encouraged to have their work phone on silent out of work hours.

2.4. Monitoring and review controls

Ongoing evaluation and review of fatigue risk controls will identify areas for improvement, gaps in administration systems and causes of any systems failures.

Reviews are to be conducted regularly, in consultation with workers, to make sure that strategies to minimise and manage work-related fatigue are effective.

When determining the frequency to monitor and review fatigue controls the following needs to be considered:

- The level of risk; high risk hazards need more frequent assessments
- The type of work practices, schedules or equipment involved
- Changes to the environment or when new tasks, equipment, process are introduced
- Data monitoring including review of incidents, near misses, injuries and other data, such as absenteeism and staff turnover rates to establish if they could be related to fatigue
- The maturity of the organisational safety culture for workers to be willing to report fatigue related issues

Data can also provide information to monitor trends or emerging risks related to fatigue.

Lead indicators

Lead indicators measure the potential of a future event. These include trending of workforce data including percentage of unfilled positions, fatigue training completion, shifts that comply with rostered work hours, fatigue hazard reports and worker questionnaires.

Lag indicators

Lag indicators measure the impact of fatigue through incident and injury statistics. These could include actual hours worked over rostered guidelines, self-reports related to fatigue and fatigue related incidents.

These results must be shared with governance structures within the organisation that oversee fatigue risk management. This could include local departmental meetings, Work Health Safety committees, committees that monitor workload (such as the Reasonable Workload Committees) and facility and NSW Health organisation executive meetings.

It is important when investigating incidents and injuries, the role of fatigue is considered as a possible contributing factor.

3. INFORMATION, INSTRUCTION AND TRAINING

Workers must be provided with information to manage and recognise the risks of fatigue in the workplace. This is to include:

- Factors that can contribute to fatigue including organisation and individual and the risks associated
- How to monitor personal fatigue levels
- Procedures to report fatigue
- Effective control measures to manage fatigue including both organisational and lifestyle factors.

Managers need information and training to understand their work health and safety obligations in relation to fatigue. Training on fatigue for managers are to include:

- Understanding their role and responsibilities
- How to recognise fatigue in workers
- How to identify fatigue hazards in the workplace
- Information on roster design including rostering best practice and leave arrangements
- How to take appropriate action if fatigue is recognised or reported
- Suggested controls to assist workers with fatigue.

A *Worker and Manager Information Sheet* is available in Section 5 Supporting Resources to assist with providing education about fatigue risk.

The Health Education and Training Institute (HETI) provides an online training module *Fatigue: Minimising the impact at work* (course code 285850115) accessed through My Health Learning.

4. ISSUE RESOLUTION

Issues related to fatigue management in the workplace for an individual or team need to be reported to the manager in the first instance and documented in ims+. For a work health and safety (WHS) issue, this can be managed and escalated according to the normal WHS consultation issue resolution process for the NSW Health organisation. This may include referral to the Health and Safety Representative, Health and Safety Committee and/or a reasonable workloads committee or equivalent and can include including the WHS consultant/ advisor.

If the issue is related to the management of an individual, the performance issue or grievance must be managed according to the NSW Health Policy Directive *Resolving Workplace Grievances* ([PD2016_046](#)) and there are additional resources available for managers on the NSW Health intranet page [Addressing grievances and concerns](#).

5. SUPPORTING RESOURCES

| Resource | Function |
|---|--|
| Fatigue Identification Checklist | This checklist can be used to assist in identifying fatigue hazards/risks in the workplace. If hazards/ risks are identified, further assessment and implementation of controls is necessary |
| Fatigue Control Chart | This chart outlines the fatigue hazards in the workplace and helps to determining the risk indicator for fatigue (lower to higher risk). The table also includes some suggested controls that can be implemented to manage the risk. |
| Individual Fatigue Self Reporting Checklist and Workplace Safety Plan | This tool can assist in identifying in real time an individual that is at risk of being fatigued. It includes a worker's likelihood of fatigue due to the quality and amount of sleep and the signs and symptoms which they present. It also has a suggested management plan based on the risk of fatigue. |
| Worker and Manager Information Sheet | An information sheet to assist in educating workers and managers about fatigue related issues. |

These resources and additional links are available on the NSW Health intranet page [Safety and Security Improvement](#).