

Policy paper:

Analysing How NRSP Utilities Forum Partners Manage Fatigue Risk

This summary outlines the commonalities, strengths, differences and shortcomings in fatigue risk management policies of utilities who provided them. It is not meant to be an exhaustive analysis, but rather a starting point for partners to consider how they could improve their fatigue management.

Fundamentally, not all organisations have a policy. From the information received, those that don't have one either:

- have one in draft, or
- rely on elements of another company hazard mitigation policy, with or without basic fatigue risk management tools, or
- rely on government/WorkSafe guides.
- confidence in organisational compliance with Workplace Health and Safety legislation.

Those that don't have a specific policy or not have one in draft have expressed a wish to develop one. Based on the data received, it appears that the further that an organisation's fleet covers in distance per year, the more developed their fatigue policy is.

Commonalities and Strengths

Risk-Based Approaches

- Organisations that have developed policies use risk-based approaches

Accountability

- For developed policies, it is common to see that staff from the managerial to employee level are accountable for managing fatigue risk. This remains the case for organisations who use other hazard mitigation policies.

Role of Employees

- The role of employees is common overall, ensuring that they are rested, fit for work and notifying managers when they feel that they are in breach of rules surrounding fatigue and driving.

Role of Managers

- The role of managers is also common, primarily being responsible for assessing the fatigue levels and fitness for work of employees at the start of and throughout the work period.

Fatigue as an Issue

- Organisations do explore fatigue risks as an issue in their policies.

Alcohol and Drugs

- Overall, the interaction between alcohol, drugs and fatigue is mentioned in the policies as part of what is considered 'fit for work'. This is consistent whether organisations have specific fatigue risk management policies or general hazard mitigation policies, where effects of these on fatigue are explained.

Presence of Training

- The presence of training to manage fatigue risk is common across organisations.



Differences and Shortcomings

The Extent that Fatigue Risk is Explored

Despite exploring fatigue, organisations differ with the extent that it is explored, specifically:

- Contributing factors of fatigue risk
- Short-term effects, such as an inability to concentrate
- Long-term effects, such as depression
- Effects of fatigue on work life are outlined, and
- Giving examples of recent fatigue-related incidents and illustrating the dangers of not managing fatigue, and what processes were implemented afterwards, an example of "Just Culture".

For more information on Just Culture, please read NRSPP Thought Leadership: 'Just culture' — The key to an effective safety culture.

Supporting Tools and Technology

Organisations differ in their use of supporting tools and technology. They either use:

- None at all, or are aiming to incorporate some
- Infographics to show the dangers of fatigue
- PowerPoint presentations that outline organisational policy in an easy to read manner
- Specific mobile applications or calculators that help employees calculate their fatigue risk
- Software that assists with the design of work and sleep schedules that will reduce the risk of fatigue and fatigue induced errors
- Software that estimates the probability of driver fatigue impairment at the time of an incident, or
- Fatigue risk management devices, either attached to workers or fixed in-vehicle.

Distraction

Only a few organisations specify interactions between distraction and fatigue, including the use of supplementary material on distraction itself.

Monitoring

Organisations differ on how they monitor fatigue. They vary with:

- Managers simply using their judgement on whether employees are fatigue affected
- Individual work sites establishing their own procedures to monitor hours worked and ensuring workers have opportunity to rest
- Using risk-assessments the following day if an employee worked at night,
- Using questions regarding whether there have been any effects on social/family life, or
- The use of long-term medical assessments based on a specific number of hours worked within a given month period, as triggered by logging software.

The Extent of Training

Despite training being a part of policies, there are differences on:

- How intensive the training can be and what is involved specifically,
- Whether there are refresher courses, and
- Whether defensive driving courses are offered

When only hazard mitigation policies are in use, organisations do provide training on how to achieve this, but it isn't specified what training, if any, is provided specifically for fatigue risk management.

Role of Contractors and Sub-Contractors

The role of contractors and sub-contractors in managing fatigue differs across organisations.

Policies range from:

- Not specifying anything specific regarding their role in this area,
- Specifying that they are expected to have and adhere to equivalent policies, or
- Requiring them to adhere to the organisation's policy.

In most cases, it isn't clear how companies who require contractors and sub-contractors to adhere to equivalent policies ensure that they are indeed equivalent or that they are being adhered to. When it was clear, it was outlined that audits are to take place within agreed time frames.

How Fatigue Risk is Managed during Emergency Works or Call-Outs

There are many instances where unplanned emergency work must be carried out in a timely manner. Organisations that carry these out should have robust fatigue risk management policies which have contingencies for these instances.

Organisations are not consistent in this regard. Policies ranged from:

- Not specifying how fatigue should be managed when these events arise,
- Specifying that work could continue in accordance with standard fatigue risk management policy, or
- Specifying that documented risk assessments be made between manager and employee before and after deployment.

Ease of Use and Understanding of Policies

Organisations differ on how clear they make it for employees to calculate the hours that they worked, with some policies better able to convey this than others. Policies that excel at this are able to convey hours of work allowed or the frequency of checks in a manner that can be established within a few seconds of reading.

It is apparent that some organisations have fatigue management roles and responsibilities of their staff presented very clearly, whereas others have not.

How Records are Kept

In most cases, unless fatigue management is conducted electronically, it is not clear as to how fatigue management records are stored.

The Role of Organisations

The roles that the organisations themselves play in managing fatigue risk is not consistently explored.

Accountability in Undeveloped Policies

It presents that organisations who don't have specific fatigue risk management policies regard employees as more accountable for managing fatigue than organisations who do.

How Organisations Empower Employees to Manage Fatigue Risk

There are differences in how some organisations encourage employees to manage their fatigue, primarily to:

- Provide input in the evaluation of fatigue risk management strategies
- Identify and implement appropriate strategies for minimising fatigue risk from specific training designed specifically for this
- Seek counselling and support that is freely provided specifically for this purpose
- Take time to understand various driving laws that apply to them and fatigue compliance, or
- Encourage leaders themselves to act in a manner that encourages employees to feel empowered, or
- Developed a personalised commute fatigue risk management plan.

In some instances, employees are encouraged to monitor other's fatigue levels and suggest to them to report being fatigued, or to even report others to managers. There was also a push to minimise lone workers, but this was also uncommon.

Questions for Organisations to consider:

1. How does your organisation excel in managing fatigue risk and how can it improve?
2. What do your employees think of how your organisation manages fatigue risk?
3. What could your organisation do to empower them to manage their own fatigue risks?



Summary of Analysis

Commonalities/Strengths	Differences/Weaknesses
1. Exploring Fatigue as an Issue	1. The Extent that Fatigue risk is Explored
2. Presence of Training	2. The Extent of Training
3. Risked-Based Approaches	3. Supporting Tools and Technology
4. Accountability	4. Distraction
5. Role of Employees	5. Monitoring
6. Role of Managers	6. Role of Contractors and Sub-Contractors
7. Alcohol and Drugs	7. How Fatigue is Managed during Emergency Works or Call-Outs
	8. Ease of Use and Understanding of Policies
	9. How Evidence is Kept
	10. The Role of Organisations
	11. Accountability in Undeveloped Policies