

INTERNAL ONLY
ISLHD PROCEDURE



Fatigue Management and Intervention

ISLHD CORP PROC 70

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NSQHS STANDARD	Standard One
SUMMARY	To provide a framework for identifying and managing fatigue across all areas of ISLHD.

1. POLICY STATEMENT

The Illawarra Shoalhaven Local Health District (ISLHD) has a legal obligation to comply with the WHS Act and the WHS Regulations 2017 to exercise due diligence to ensure, where practicable, risk management practices are undertaken to eliminate or mitigate risks to workers' health, safety and well-being.

ISLHD will, as far as is reasonably practicable, ensure the health and safety of all employees by identifying and managing staff who are at risk or affected by fatigue.

2. BACKGROUND

The Work Health and Safety Act 2011 and the Work Health and Safety Regulation 2017 places a legal obligation on employers to provide a safe environment for all staff, contractors, volunteers, students and visitors by identifying, assessing, eliminating or controlling foreseeable workplace risks.

It is normal for workers, especially those undertaking shift work, to experience fatigue – a state of reduced mental or physical capacity caused by factors including sleep loss, extended time awake, circadian phase (time of day) and workload.

Fatigue can cause performance impairment. The level of impairment depends on the degree of fatigue experienced and the impact of fatigue on the task being done at the time.

Some of the risks associated with fatigue include:

- Decreased vigilance, concentration and attention
- Judgement is altered and quality of decisions affected
- Reaction time slows
- Memory affected
- Sleepiness and periods of micro sleeps (lasting 4 to 6 seconds) can occur

Factors occurring outside of work may also contribute to fatigue. A worker's lifestyle, family responsibilities, mental or physical health e.g. insomnia, sleep apnoea, taking of medication or drug use, secondary employment or extended travel between work and home may all increase the risk of fatigue that impacts on the workplace and worker.

3. RESPONSIBILITIES

3.1 Employees must:

- Comply with the contents of this document
- Comply with any measures implemented by their line manager to identify and manage signs of their own fatigue and that of other employees they work with.
- Take responsibility for their own safety and health including proactively identifying, managing and reporting their own fatigue.
- Contribute to the identification of safety critical tasks with their manager and assist in assessing and developing a safe work procedure that includes fatigue identification and management controls.

3.2 Line Managers must:

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- Implement and comply with fatigue identification, management and intervention procedures
- Ensure staff are aware of the local arrangements for fatigue identification and management
- Identify safety critical tasks being performed within their department
- In consultation with workers, assess and develop safe work procedures that include fatigue identification and management controls
- Disseminate fatigue information and train workers on how to identify and manage fatigue
- Review fatigue management controls on a regular basis
- Report and log fatigue-related risks in their hazard register

3.3 General Managers/ Service Directors must:

- Ensure compliance with all aspects of the fatigue identification, management and intervention procedure, and support all work areas under their management to be able to comply with this procedure.

3.4 Chief Executive must:

- Ensure the implementation of the fatigue identification, management and intervention procedure within ISLHD that is consistent with the objectives of NSW Health and is compliant with WHS legislation.

4. PROCEDURE

Fatigue is a state of mental or physical exhaustion that can affect a person's ability to function normally. Workplace fatigue can be caused by long periods of high physical and/or mental demands of the work being conducted without sufficient time to rest and recover. These factors should be taken in consideration as they may indicate areas where action should be taken to reduce risks. Many of these hazards can be interrelated and in some cases cumulative.

Other contributing factors could be:

- Mental and physical demands of work
- Work scheduling and planning
- Performing safety critical tasks for extended periods of time
- Performing repetitive tasks for extended periods
- Specific work demands
- Extremes in the work environment such as heat, cold or noisy workplaces
- Organisational factors
- Driving for long periods or at odd hours
- Individual and lifestyle factors

4.1 Identification of fatigue

Fatigue can be identified in one of four ways:

- Observation of the worker; not functioning as they usually would
- Self-reporting signs of fatigue

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- Excessive leave being taken without explanation
- Through the use of [ISLHD CORP F302 – ISLHD Worker Fatigue Hazard Identification Checklist](#).

Managers and workers need to be mindful of the following signs of fatigue:

- Headaches and/or dizziness
- Wandering or disconnected thoughts, daydreaming, lack of concentration
- Blurred vision or difficulty keeping eyes open
- Constant yawning, a drowsy relaxed feeling or falling asleep at work
- Moodiness, such as irritability
- Short term memory problems
- Low motivation
- Hallucinations
- Impaired decision-making and judgment
- Slowed reflexes and responses
- Reduced immune system function
- Forgetfulness or reduced clarity of recent events
- Increased errors in performing usual work tasks
- Extended sleep during days off work
- Falling asleep for less than a second to a few seconds and being unaware they have done so; otherwise known as micro-sleeps
- Drifting in and out of traffic lanes or missing gear changes and turn offs when driving.

4.2 Confirmation with worker

Workers that show any of the above signs require an ISLHD CORP F302 – ISLHD Worker Fatigue Hazard Identification Checklist to be completed. Engage the worker in conversation about their symptoms and discuss with them what has been observed. This should include a check on their welfare.

Has the worker an understanding and explanation for what you have observed?

An explanation does not discount what has been observed but may offer background information that assists with identifying what support can be provided and if any further action is required.

The explanation may also provide direction for subsequent welfare questions, the purpose of which is to encourage the worker to take responsibility for their functioning, to think about the reasons behind their fatigue-related risk and to emphasise that the worker has a role to play in preventing fatigue risks and it is a collaborative process to address these with the manager/supervisor.

- Personal insight
 - What is the worker's understanding and how do they explain what has been observed?

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- If the worker is unable to understand or explain what has been observed it is important for the manager/supervisor to work through the following points to help them understand and develop a plan to address any concerns.
- Sleep
 - How many hours since they last slept?
 - How long did they sleep?
 - Have they experienced a recent change in their sleeping habits?
 - Do they have a reason/s for not getting enough sleep or poor sleep?
- Work duties
 - What tasks have they been working on this roster?
 - Are the tasks repetitive in nature?
 - Do the tasks require operating hazardous equipment?
 - Are the tasks considered high risk?
 - If so, how long have they been working on that task?
- Breaks
 - When did they last have a break in shift?
 - What was the duration of that break?
 - When did they last drink some water or eat something?
 - What do they usually do to prevent fatigue?

Where fatigue is identified as a risk factor in performing work, the manager/supervisor is required to assess and implement control measures. This may include developing a departmental plan as well as an individual fatigue identification and management plan.

These plans can be documented on [ISLHD CORP F32 – WHS Fatigue Management Risk Assessment Tool](#).

4.3 Assess the level of risk

When assessing the level of risk consider the following:

- Have any fatigue-related incidents or near misses occurred?
- Has the worker been identified as at 'fatigue risk'?
- Is there a risk to self, patients, or others associated with the worker's functioning and or behaviour?
- Have any safety critical tasks been identified?

Safety Critical Tasks

In consultation with workers, the manager/supervisor is to identify if any safety critical tasks are being performed within the department. Safety critical tasks are defined by Safe Work Australia as tasks requiring a high level of concentration, alertness and/or coordination and where the consequences of a mistake or error in judgment could cause serious injury or harm.

4.4 Fatigue Management – Actions to manage fatigue

When information has been obtained, identify the level of risk associated with the worker continuing to work without intervention. If the risk of continuing is unacceptable,

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determine which of the following control measures could be implemented to minimise the immediate risk.

Short term control measures:

- Direct the worker onto an unscheduled or rescheduled meal break.
- Discuss the option of a change of environment for a brief period – relevant to the role of the worker.
- The worker's manager/supervisor may consider that a worker is not fit for work and may direct them to take leave (see PD2022_006 Leave Matters for the NSW Health Service for further guidance).
- Where driving home presents a further fatigue risk, the manager/supervisor must arrange transport for the worker to ensure that they get to their home safely.
- If it is not possible to provide this assistance, consideration must be given to providing accommodation as close as possible to the work area to allow the worker time to sleep prior to travelling home.

The type of leave to be entered into the relevant roster system is to be discussed with the worker e.g. sick leave, AOE (Absent at Own Expense), Annual Leave, etc. (see PD2022_006 Leave Matters for the NSW Health Service).

Where a worker has been identified as exhibiting symptoms of fatigue and has been assisted in managing this in the short-term, their manager/supervisor must discuss long term plans for managing fatigue with the worker.

A fatigue management plan is to be developed and documented in consultation with the worker, and is to be reviewed on a regular basis – specific to the individual circumstances. This plan is to be documented using the action plan section of ISLHD CORP F32 – WHS Fatigue Management Risk Assessment Tool.

The following table may assist as part of longer term planning. Reference should also be made to the following procedures and guidelines:

- [Rostering Principals for all Junior Doctors](#)
- [Rostering Best Practice](#)
- [Fatigue – Preventing and managing work related fatigue: Guidelines for NSW Public Health system](#)

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Risk factor	Control measures to consider – Where reasonably practicable
Mental and physical demands of work	
<ul style="list-style-type: none"> • repetitive or monotonous work; • sustained physical or mental effort; • sustained and/or complex physical or mental tasks • sustained positions i.e.: sitting or standing • sustained fine motor skill or area of focus i.e.: a computer 	<ul style="list-style-type: none"> • Re-design jobs to eliminate or provide change/breaks to repetitive tasks • Regularly include fatigue identification and mitigation in discussions with workers • Provide training to allow multi-skilling and effective job rotation • Use plant, machinery and equipment to eliminate or reduce the excessive physical demands of the job • Alternate tasks to reduce the amount of time workers need to spend performing sustained physically and mentally demanding work • Ensure there are adequate workers and other resources to do the job • Roster enough workers during peak times and demands • Ensure adequate breaks during shifts to allow respite and recovery • Eliminate or mitigate hazards that might exacerbate fatigue e.g. manual handling, extremes of temperature • Review the duration and timing of work • Ensure safe and efficient shift hand-over • Department/service contingency plans for peak service periods or emergencies where workers will have to unexpectedly work longer hours, more shifts or a long sequence of shifts.
Work scheduling and planning	

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<p>Varying shift patterns including afternoon, night shifts. This may include a number of consecutive night shifts</p>	<ul style="list-style-type: none"> • Eliminate the use of night shifts for particular jobs or activities • Schedule complex tasks for daytime • Schedule work for hours when the risks may be lower – for example, complex and safety-critical tasks are best undertaken during day shifts when workers are less likely to be fatigued • Limit the number of consecutive night shifts worked • Minimise or redesign routine administrative tasks during night shifts to ensure workers can focus on core duties • Allow regular night-shift workers periods of night time sleep to catch up on their sleep deficit • Ensure that rosters allow for at least two full nights' off work after the last night shift • Arrange shifts so that day sleep is adequate • Use a forward-rotation shift system (i.e. morning to afternoon, afternoon to night) • Improve the order, speed, direction and length of rotation of the shift cycle • Except for emergencies, give at least 24 hours' notice before night work. Where able to, consider providing a longer period of notice so that workers have time to adjust their activities i.e.: have a nap before work • Encourage good sleep hygiene and napping where able.
<p>Shift start/finish times</p>	<ul style="list-style-type: none"> • Ensure time for adequate communication at shift handovers • Provide information to shift workers that contains tips for them to prevent and manage fatigue <p>Provide information to shift workers on good sleep hygiene See also: Fatigue Fact Sheet</p>
<p>Short breaks between work shifts</p>	<ul style="list-style-type: none"> • Increase the length of breaks between shifts • Allow for recovery between work periods • Defer non-urgent work to allow appropriate rest and recuperation for workers • Where needed, make sure that there is enough time in a break for uninterrupted sleep.
<p>Changes to rosters</p>	<ul style="list-style-type: none"> • Set shift rosters ahead of time and avoid sudden changes of shifts to allow workers to plan leisure time • Reduce irregular and unpredictable work schedules • Manage workload and work-pace change caused by machinery breakdowns or planned and unplanned absences • Design rosters so there is adequate recovery time between shifts to travel, eat, wash and sleep.
<p>Work scheduling and planning</p>	

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<p>Long hours because of on call duties</p>	<ul style="list-style-type: none"> • Increase the length of breaks between shifts • Allow for recovery between work periods • Defer non-urgent work to allow appropriate rest and recuperation for workers • Provide rest days i.e.: opportunity for two consecutive night sleeps • Make sure that there is enough time between shifts for six hours uninterrupted sleep • Allow provisions for coverage of usual shifts where a worker has been actively working during an on-call period.
<p>Short breaks between work shifts</p>	<ul style="list-style-type: none"> • Provide more and/or longer breaks to allow for recovery within work periods • Provide adequate resources to cover breaks • Ensure adequate number and location of toilet facilities • Where split shifts are used, arrange timing so sleep of workers is not disrupted due to the times they are required to work.
<p>Long hours of work in a single shift. This includes travel time, especially for remote sites</p>	<ul style="list-style-type: none"> • Reduce working hours • Provide adequate resourcing for the task/shift • Eliminate the use of extended hours for particular jobs or activities • Control the length of shifts • Limit the use of overtime, especially unscheduled overtime • Monitor hours of work including active on-call shifts • Limit shifts to 12 hours including overtime. • Avoid overtime allocation after afternoon or night shifts, particularly after 10 or 12 hour night shifts. <p>See also: PD2019_027 - Employment Arrangements for Medical Officers in the NSW Public Health Service</p>
<p>Long hours of work across a shift cycle</p>	<ul style="list-style-type: none"> • Limit use of standby and on-call duties • Ensure that exchange of shifts does not result in excessive hours at work or on-call.
<p>Work environment conditions</p>	
<p>Stress</p>	<ul style="list-style-type: none"> • Improve job control and the other risk factors associated with stress • Ensure opportunities to clarify stress-related issues • Monitor workers during peak periods or unexpected increases in workload.
<p>Adverse physical conditions</p>	<ul style="list-style-type: none"> • Avoid working during periods of extreme temperature • Control exposure to hazardous substances and environments • Use effective protective clothing and equipment, • Allow shift rotation i.e.: no permanent night shift • Use heating and cooling to control ambient temperatures to support alertness • Ensure the workplace and surroundings are well lit, safe and secure • Reduce exposure to excessive or uncontrolled noise levels.

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Work environment conditions	
Repetitive tasks Effect of exposure during extended shifts	<ul style="list-style-type: none"> Workers who perform repetitive tasks should have regular rest breaks Workers who perform regular manual tasks should have SWMS developed and access to relevant aides or assistance Ensure exposures are carefully monitored and exposure levels adjusted. For example, refer to Noise Procedure for Noise related risks.
Other contributing working conditions	
Leave management	<ul style="list-style-type: none"> Put in place local processes to manage accrued leave. Refer MoH Leave Matters Manual. Consider future rosters and schedules when approving request for leave or shift swaps, to ensure there is still a manageable workload for the work team. Fill vacant positions as soon as reasonably practicable. Ensure the impact of service delivery needs on workers is considered. Ensure sufficient workers are made available to fill a roster. Have access to on-call workers for unplanned leave, emergencies or where workload increases.
Absenteeism	<ul style="list-style-type: none"> Ensure absenteeism is monitored against accrued leave balances and requests for leave. Refer MoH Leave Matters Manual.
Organisational factors	<ul style="list-style-type: none"> Encourage workers to report any concerns they may have about work- related fatigue. Consider measures to identify and manage the risk of workers driving home tired or fatigued after long working hours or night work Consider alternative options to face-to-face meetings such as teleconferencing. Where workers travel long hours to undertake their work i.e.: attending an alternate site for a meeting; consider overnight accommodation to avoid driving when tired or fatigued Review the need for subcontractors or labor hire staff to work similar shifts and shift cycles to the permanent workforce. Allow trial periods for new working arrangements and evaluating them.
Individual and non-work factors	<ul style="list-style-type: none"> Provide access to suitable professional advice, e.g. an employee assistance program, sleep disorder clinic Maintain vigilance in identifying non-work related factors Provide information and education about how non-work related factors can increase the risks of fatigue Provide a mechanism to encourage workers to report non-work factors that might affect fatigue management.

4.4 Escalation process

If an issue regarding fatigue has been identified (section 4.1), and a fatigue management plan has been developed (sections 4.2 and 4.3), but the issue has not been satisfactorily

mitigated or resolved, the following is the process to ensure the appropriate escalation and management:

1. The relevant manager/supervisor is to consult with the affected worker(s) and review the root cause of the fatigue issue. To ensure the correct root cause is identified, consult with the local Safety Advisor when conducting this review. Once the issue has been reviewed, update the Fatigue Management Plan accordingly.
2. If the issue persists after the above review has taken place, the relevant manager/supervisor should escalate the issue to their manager and/or seek support from the Workforce Support team.
3. In the unlikely scenario that the issue cannot be resolved using the above steps, input from an external expert may be necessary to resolve the problem. This step would require approval from the relevant Tier3 manager.

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5. DOCUMENTATION

[ISLHD CORP 32 – ISLHD Fatigue Management Risk Assessment Tool](#)

[ISLHD CORP 302 – ISLHD Worker Fatigue Hazard Identification Checklist](#)

6. AUDIT

Compliance with this procedure will be audited through internal and external review mechanisms at least every two years.

7. REFERENCES

- [WHS Act 2011](#)
- [WHS Regulations 2017](#)
- [Work Health and Safety: Better Practice Procedures](#)
- [Rostering Principles for all Junior Doctors](#)
- [Rostering Best Practice](#)
- [Fatigue – Preventing and managing work related fatigue: Guidelines for NSW Public Health system](#)

8. REVISION & APPROVAL HISTORY

Date	Revision No.	Author and Approval / Date
March 2015	0	Author: ISLHD Quality / Accreditation Manager Approved by the ISLHD Corporate Services & Safety Management Committee on 12
		Approval / Date: Approved by Director Clinical Governance
February 2018 April 2018	1	Author: Senior Manager, Workforce Health and Safety
		Approval / Date: Executive Director Strategic Improvement Programs
May 2021 Nov 2021	2	Author: Safety Coordinator
		Approval / Date: Senior Manager, Workforce Health and Safety
August 2022	3	Author: Safety Coordinator
		Approval / Date: Director, Corporate Governance & Risk Management / August 2022