

# Fatigue Management Procedure

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## Purpose

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The purpose of this procedure is to ensure the effective, systematic and consistent management of all risks associated with driver fatigue and the continuous improvement of our Fatigue Risk Management Framework.

## Scope

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This procedure applies to any worker with control over or that might influence the fatigue of a heavy vehicle driver (including but not limited to the roles listed below).

## Procedure detail

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### Overview of fatigue management

The purpose of fatigue management is to identify and assess potential fatigue-related risks before they occur so that risk treatment measures can be implemented which either eliminate the risk entirely (where practicable), or reduce the likelihood that the risk will occur or reduce the potential adverse consequences of the risk.

## Fatigue Risk Management Framework

Our Fatigue Risk Management Framework incorporates the relevant Fatigue Management Strategy that we operate under (i.e. Standard Hours, Basic Fatigue Management or Advanced Fatigue Management) and contains the same set of stages included in the Risk Management Procedure. Refer to the Risk Management Procedure for further guidance on each of the following stages.



### Establish the context

This stage defines the basic parameters for fatigue risk management and sets the scope for the rest of the risk management process. The context is established as part of our general Risk Management Framework and is then applied throughout the organisation.

### Identify risks

This stage can either take place at initialisation or during maintenance.

During initialisation, this stage identifies the individual risks to be managed in our workplace by systematically identifying what can happen, when, where, how, why and to who. The aim is to generate a comprehensive list of fatigue-related risks which will be added to the Risk Register.

During maintenance, this stage works in conjunction with the Monitor and Review stage to identify whether:

- implemented control measures result in new risks
- reported hazards, near-misses or incidents highlight new risks
- new activities, processes, equipment etc. result in new risks

This stage will incorporate recommendations from the:

- Hazard Observation Form (where a hazard has been observed)
- Incident Report Form (where an incident has been reported)
- Other Risk Management Framework processes (e.g. review of policies, procedures and data)
- Industry bodies, specialists and representatives

This stage will focus on those tasks and roles that have a potential impact on driver fatigue, such as consignors, consignees, schedulers, drivers, loaders, packers, driver/scheduler managers, loading managers and the transport operator itself.

Fatigue-related risks can be divided into two categories representing shared responsibility:

1. work-related risks (responsibility of the organisation)
2. non work-related risks (responsibility of the worker)

Common fatigue-related risks include:

Work-related risks	Non work-related risks
<ul style="list-style-type: none"> <li>• Schedulers over-scheduling a driver for a shift that exceeds the allowable work time based on the work and rest hours option they operate under</li> <li>• Schedulers allocating time slots that cannot be met without a driver skipping a rest break</li> <li>• Schedulers scheduling drivers to work combinations of day shifts and night shifts</li> <li>• Schedulers not rostering sufficient rest periods between shifts</li> <li>• Loaders experiencing delays in vehicle loading which impact the drivers' work time</li> <li>• Consignors demanding unachievable delivery times</li> <li>• Transport company not providing appropriate facilities to enable drivers to rest</li> <li>• Transport company payment schemes that incentivise drivers to skip rest breaks</li> </ul>	<ul style="list-style-type: none"> <li>• Drivers not being able to recognise and act on their fatigue warning signs</li> <li>• Drivers starting a shift already fatigued from factors in their personal life such as a new baby or excessive social activities</li> <li>• Drivers repeatedly not getting enough good quality sleep between shifts leading to accumulated sleep debt</li> <li>• Drivers with poor health habits such as excessive smoking, drinking, and use of caffeine</li> <li>• Drivers with undiagnosed or un-reported medical conditions that cause fatigue such as insomnia</li> </ul>

Fatigue-related risks can be identified in a range of ways, such as:

- making informed opinions based on experience and industry trends
- consulting with drivers, schedulers and other appropriate workers
- inspecting rosters and schedules

- analysing hazard observations, incident and near-miss reports and other documentation
- observing scheduling, loading and driving-preparation activities
- auditing the Fatigue Risk Management Framework annually

### **Assess risks**

This stage involves analysing and then evaluating the identified fatigue-related risks.

Analysing involves considering the sources of fatigue-related risk and combining their potential consequences and the likelihood that they will occur in order to allocate their risk level. It is important to evaluate the effectiveness of existing controls that have already been implemented from previous risk management activities.

Analysing the likelihood and consequence of fatigue-related risks can be difficult because individuals respond differently to factors that may contribute to fatigue. For example, a factor that causes one person to feel fatigued may have little impact on another person. There are some factors that are likely to contribute to fatigue in a majority of individuals because they disrupt normal body rhythms or prevent adequate rest and recovery. These include the:

- total length of the shift
- total number of hours worked during the shift
- type of work performed
- time of day when work is performed
- length of rest break during the shift
- length of rest break between shifts
- number and regularity of night shifts
- number and regularity of on-call shifts

Evaluating is about using the outcomes of the risk analysis to decide which of the fatigue-related risks need risk treatment measures and their priority for implementation.

When assessing the risk of fatigue, it is important to remember that fatigue is cumulative. A risk that has a low or moderate risk level but is ongoing, can lead to severe consequences if not treated.

Likelihood	Consequences				
	Insignificant	Minor	Moderate	Major	Severe
Almost certain	Moderate	High	High	Extreme	Extreme
Likely	Moderate	Moderate	High	High	Extreme
Possible	Low	Moderate	Moderate	High	Extreme
Unlikely	Low	Moderate	Moderate	Moderate	High
Rare	Low	Low	Moderate	Moderate	High

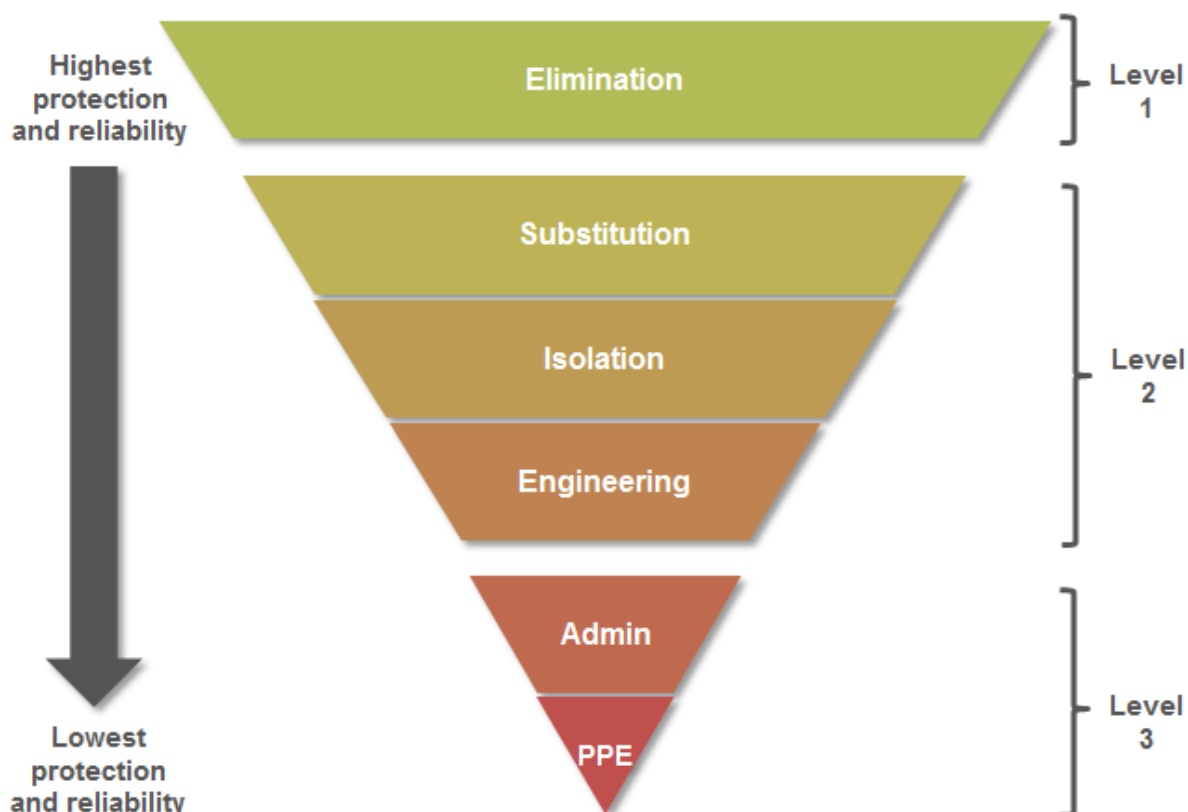
### Treat risks

This stage involves identifying, assessing, selecting, documenting and implementing the risk treatment options that will eliminate the fatigue-related risks that will not be tolerated or minimise them if elimination is not reasonably practicable.

Risk treatment options	
Eliminate the risk	By removing the risk altogether (uses Elimination from the Hierarchy of Controls below)
If you can't eliminate the risk, then consider:	
Reduce or control the risk consequences	By implementing one or a combination of control measures from Substitution, Isolation, Engineering, Administration and PPE from the Hierarchy of Controls below

Reduce or control the risk likelihood	By implementing one or a combination of control measures from Substitution, Isolation, Engineering, Administration and PPE from the Hierarchy of Controls below
Share the risk	By sharing or transferring ownership and liability for the risk to another party (e.g. partnership/joint venture or insurance)
Tolerate the risk	By making an informed decision to accept the risk at its current risk level

The Hierarchy of Controls is used to rank each treatment option (risk control) from the highest level of protection and reliability to the lowest. You must always aim to eliminate a hazard, which is the most effective control. If this is not reasonably practicable, you must minimise the risk by working through the other alternatives in the hierarchy.



<b>Hierarchy of Controls</b>	
Level 1: Always aim to eliminate the risk	
<b>Elimination</b>	Involves removing the risk altogether, for example, enforce and monitor two-up drivers for journeys over a certain distance to eliminate the potential to exceed the legal work hour requirements
Level 2: If it is not reasonably practicable to eliminate the hazards and associated risks, you should minimise the risks using one or more of the following approaches	
<b>Substitution</b>	Involves substituting the hazard with a hazard that has a lower risk, for example, alter rostered hours to reduce the number and duration of night shifts
<b>Isolation</b>	Involves separating the hazard from the person at risk, for example, providing drivers with rest facilities away from noise and distraction
<b>Engineering</b>	Involves applying mechanical devices or processes, for example, re-engineering the process for loading and unloading to reduce wait times for drivers
Level 3: Should only be used as a last resort, an interim measure or to support a higher level control measure	
<b>Administration</b>	Involves minimising the risk by administrative means, such as procedures and training, for example, providing training in safe scheduling procedures to schedulers. It is not recommended to use this control on its own as it relies on human behaviour and supervision.
<b>Personal Protective Equipment (PPE)</b>	Involves using PPE, for example, ensuring vehicle seatbelts and airbags are maintained and in good condition. While this option can provide added protection, it is considered the least effective control method.

Common fatigue-related risk treatment options (controls) include:

- scheduling:



- implement rosters and schedules that meet all legal work and rest hour requirements
- use predictable rosters (where possible) that limit the number of night shifts and provide appropriate rest breaks during and between shifts
- restrict shift work, especially night shifts, to essential tasks and projects
- avoid high-risk, complex tasks during fatigue risk periods (e.g. 2am-6am)
- assess new rosters or alterations to existing rosters to identify any fatigue-related risks prior to implementation
- reduce the need for workers to be on-call
- consider the impact of work-related phone calls that disrupt a worker's sleep while not at work
- monitoring and supervision:
  - provide suitable supervision during shift work (especially high-risk tasks)
  - monitor workers for signs of fatigue
  - conduct random fatigue assessments of workers
  - monitor rosters, schedules and trip plans for risks
- contingency plans:
  - provide a process for fatigued workers to stop work and report to their supervisor (without penalty) rather than continuing working and risking a fatigue-related incident
  - provide a process to manage a fatigued worker (e.g. re-allocate to suitable alternative duties or send home to gain suitable rest)
- policies, procedures and tools that:
  - communicate the roles, responsibilities and requirements of the Fatigue Risk Management Framework
  - enable those roles with control or influence over driver fatigue to eliminate or minimise fatigue-related risks (e.g. Safe Driving Plans, Driver Fitness for Duty Checklist and Declaration, Scheduler Checklist)
- information and training on:

- roles, responsibilities and requirements of the Fatigue Risk Management Framework
- legal work and rest hour requirements and other requirements under the legislation
- identifying the signs of fatigue in yourself and others
- managing work and non-work related fatigue
- counselling, support and treatment:
  - provide a confidential Employee Assistance Program (EAP) through an external service provider that is available to all workers and their families (places emphasis on the recognition and management of fatigue)
  - provide treatment and/or support for workers who experience fatigue-related issues
- consignor/consignee:
  - inform consignors/consignees of the effect of unreasonable scheduling demands
  - obtain consignor/consignee commitment to safe scheduling practices

All risks, risk treatment options (controls), implementation plans, responsible persons and due dates must be recorded in our Risk Register and implemented into any relevant documentation such as Safe Work Procedures.

## **Monitor and review**

This stage involves the ongoing monitoring and review of the fatigue-related risks and their controls.

The monitoring and review process can take place on a:

- day-to-day basis as part of daily operations
- ad-hoc basis, for example, after an incident has been reported
- scheduled basis as part of annual audit processes

This stage checks that the controls:

- have been implemented
- continue to be effective in eliminating or minimising the risks
- do not result in new risks

If non-conformances or new risks are identified, then the risk management process will need to be repeated to make further decisions about risk treatment.

Our Risk Register will specify who is responsible for implementing the risk controls and by which date. It will also set out the date of the next review of the risk and controls.

### **Communicate and consult**

It is important to communicate and consult with all relevant stakeholders (the parties impacted by the risks and/or controls) at each stage of the fatigue risk management process.

## **Responsibilities**

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Romann Logistics has identified the following roles within our organisation with obligations for fatigue management, as:

- employer of the driver of the vehicle/prime contractor of the driver/operator of the vehicle/person conducting a business or undertaking (PCBU) referred to as 'the Transport Company'
- driver/scheduler manager
- loading manager of goods for transport by the vehicle
- driver of the vehicle
- scheduler of goods for transport by the vehicle and/or the vehicle driver
- packer of goods to be loaded on to the vehicle

- loader of goods on to the vehicle
- unloader of goods from the vehicle
- consignor/consignee of goods for transport by the vehicle

A summary of the key responsibilities for each role are listed below.

### **Transport Company Responsibilities**

*The 'transport company' includes the employer, prime contractor, operator and/or PCBU. In our organisation this responsibility is accepted by the Director(s).*

The transport company must ensure that:

- the Fatigue Risk Management Framework is developed and implemented in accordance with the requirements of the relevant Fatigue Management Strategy
- they take all reasonable steps to ensure a driver does not drive a heavy vehicle while impaired by fatigue or in breach of their work/rest hours option
- all roles with responsibilities for the Fatigue Risk Management Framework are clearly defined, documented and communicated
- all workers whose actions may control or influence driver fatigue are appropriately trained in their responsibilities
- all workers are aware of their right to stop work and report to their supervisor (without penalty) rather than continuing working and risking a fatigue-related incident
- driver rosters and schedules do not require drivers to exceed the relevant Fatigue Management Strategy work and rest hours
- drivers are able to take their required rest breaks under the relevant Fatigue Management Strategy
- the time slot at the destination is able to be met within the legal driving hours, allowing for required rest breaks
- drivers adhere to contingency procedures that are in place to cope with unexpected circumstances like road works and traffic accidents

- prior notification is given to the receiving/dispatching site if a timeslot cannot be made due to delays
- parking, queuing and loading/unloading practices are streamlined to minimise delays
- a truck parking area and appropriate rest facilities are provided
- a work environment that assists workers to remain alert while completing work tasks is provided (e.g. appropriate lighting, ventilation, noise levels, heat levels, access to facilities)
- drivers are certified as being fit to drive a heavy vehicle by a medical practitioner prior to employment and on a regular basis thereafter (i.e. every three years)
- drivers are fit for work before and during each shift
- they provide counselling, support and treatment options to workers who experience or are at risk of fatigue
- appropriate records are kept of the drivers' activities, including driving and rest times, in accordance with the Fatigue Management Strategy and the transport company's Policies and Procedures
- all elements of the Fatigue Risk Management Framework are monitored on an ongoing basis and reviewed on an annual basis (at a minimum) to ensure continued compliance

### **Driver/Scheduler Manager Responsibilities**

*The driver/scheduler manager is a worker who supervises the activities of drivers and/or schedulers. In our organisation this responsibility is accepted by the National Operations Manager and Agent.*

The driver/scheduler manager must:

- ensure the Fatigue Management Policy, Procedure and Framework are effectively implemented within their area of control
- accept accountability for ensuring that the workplace under their control is safe and free from fatigue-related risks
- accept accountability for ensuring that the behaviour of workers under their control is safe and free from fatigue-related risks

- monitor and review the elements of the Fatigue Risk Management Framework within their area of control on an ongoing basis (e.g. review of workloads, rosters, schedules, driver work diaries)
- consult with their team when implementing new systems of work (e.g. new shifts)
- monitor and ensure the fitness for duty of drivers within their area of control before and during shifts
- resolve or appropriately escalate fatigue-related issues promptly
- attend appropriate training specified by the company (e.g. TLIF3063 Administer the Implementation of Fatigue Management Strategies)

### **Loading Manager Responsibilities**

*The loading manager is a worker who supervises the activities of loaders or unloaders. In our organisation this responsibility is accepted by the Consignor.*

The loading manager must:

- ensure loading/unloading arrangements do not cause or contribute to a driver driving while fatigued or in breach of their work/rest hours option
- stop loading and contact the transport company or site manager if a driver appears fatigued
- minimise queues and have a call-up system available (on arrival, the driver checks in with the appropriate office)
- notify the driver and/or scheduler immediately of any loading delays or potential missed timeslots
- take reasonable steps to ensure the driver is able to take rest while waiting for the vehicle to be loaded/unloaded
- contact the transport company if the truck does not arrive on time and advise them of the next available time slot or the delay time
- attend appropriate training specified by the company (e.g. TLIF3063 Administer the Implementation of Fatigue Management Strategies)

### **Driver Responsibilities**

*The driver is a worker who drives the heavy vehicle and transports the load to its destination by road. In our organisation this responsibility is accepted by the Driver.*

The driver must:

- take responsibility for maintaining their personal health and fitness for work
- present themselves in a fit state to perform their work unimpaired by fatigue
- avoid behaviours and practices that may contribute to their fatigue and create a risk (e.g. undeclared secondary employment)
- use time away from work to obtain sufficient restorative sleep to manage fatigue-related risks
- understand the Fatigue Management Strategy they are operating under and how to comply with that Fatigue Management Strategy
- understand when they can start and stop driving and how long their breaks should be
- understand whether they can complete the journey within time allowing for delays and rests
- understand whether they can make the timeslot (and communicate any issues or delays to the transport company)
- understand how to record their driving hours
- are able to identify when they are showing signs of fatigue and take appropriate action
- exercise their right to stop work and report to their supervisor (without penalty) if they are fatigued rather than continuing working and risking a fatigue-related incident
- do not drive a heavy vehicle while impaired by fatigue or in breach of their work/rest hours option
- attend appropriate training specified by the company (e.g. TLIF2010 Apply fatigue management strategies)

### **Scheduler Responsibilities**

*The scheduler is a worker who has influence or control over the delivery time (often the person who schedules the transport of goods by road). In our organisation this responsibility is accepted by the National Operations Manager and Agent.*

The scheduler must ensure that:

- driver rosters and schedules do not require drivers to exceed driving hours regulations
- drivers are able to take their required rest breaks
- the time slot at the destination is reasonably able to be met within the legal work and rest hours
- drivers adhere to contingency procedures that are in place to cope with unexpected circumstances like road works
- prior notification is given to the receiving/dispatching site if a timeslot cannot be made due to delays
- attend appropriate training specified by the company (e.g. TLIF2010 Apply fatigue management strategies and TLIF3063 Administer the Implementation of Fatigue Management Strategies)

### **Packer Responsibilities**

*The packer is a worker who packs and prepares the goods prior to loading. In our organisation this responsibility is accepted by the Consignor.*

The packer must ensure that the load is:

- packed in a timely manner, without unnecessary delays
- packed and ready to be loaded at the agreed loading time in a manner that enables efficient loading to take place
- attend appropriate training specified by the company (e.g. TLIF2010 Apply fatigue management strategies)

### **Loader Responsibilities**

*The loader is a worker who is responsible for loading the goods into or onto the vehicle. In our organisation this responsibility is accepted by the Consignor.*



The loader must ensure that the load is:

- loaded in a timely manner, without unnecessary delays
- ready to be loaded at the agreed loading time
- attend appropriate training specified by the company (e.g. TLIF2010 Apply fatigue management strategies)

### **Unloader Responsibilities**

*The unloader is a worker who is responsible for unloading the goods from the vehicle. In our organisation this responsibility is accepted by the Consignee.*

The unloader must ensure that the load is:

- unloaded in a timely manner, without unnecessary delays
- attend appropriate training specified by the company (e.g. TLIF2010 Apply fatigue management strategies)

### **Consignor/Consignee Responsibilities**

*The Consignor is the person or company who dispatches the goods for delivery.  
The Consignee is the person or company who orders and/or receives the goods.*

The consignor/consignee must ensure that:

- orders are placed in a timely manner to allow for dispatch that can meet delivery requirements
- the time slot for dispatch or receival factors in appropriate time for the job to be completed within the legal driving hours including required rest breaks
- the delivery request does not require (or incentivise) the driver to drive while fatigued and/or exceed driving hours and/or forego minimum rest periods
- if the agreed time is not met, alternate agreements are in place to ensure they do not breach Heavy Vehicle National Laws
- contracts with transport operators include fatigue management requirements

## Supporting records

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The following records are created, maintained and reviewed as part of the requirements of this procedure:

- BFM/AFM Requirements Summary
- Driver Fitness for Duty Checklist
- Driver Work Diary
- Work & Rest Hours Planner
- Time slot Reschedule Checklist
- Driving Distance Matrix
- Driver Time on Site Tool
- Safe Driving Plan
- Scheduler Checklist

## Supporting policies and procedures

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This procedure operates within the Risk Management Framework outlined in the Risk Management Policy and Procedure, Work Health and Safety Policy, CoR Policy and Fatigue Management Policy.

This procedure should be read and followed in conjunction with:

- Consultation and Communication Policy
- Speed Management Policy and Procedure
- Load Management Policy and Procedure
- Vehicle Standards and Maintenance Policy and Procedure
- Hazard Observation Procedure
- Incident Management Procedure

## Implementation and evaluation

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Romann Logistics will ensure this Procedure is reviewed and evaluated for its effectiveness in delivering objectives on an annual basis or earlier in the event of major changes to the legislation or our organisation structure and operations.

## External documents

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To download a copy of the Model Code of Practice – How to Manage Work Health and Safety Risks, go to

<http://www.safeworkaustralia.gov.au/sites/swa/about/publications/pages/manage-wh-s-risks-cop>

To purchase a copy of the Australian Standard for Risk Management – Principles and Guidelines AS/NZS ISO 31000:2009, go to [www.saiglobal.com](http://www.saiglobal.com)

**Procedure authorised by: George Manassa,  
National Business Development Manager**

**Signature: GM, digitally signed 05.04.2022**

*Procedure issue date: 04.04.2022*

*Procedure version number: v1*

*Procedure review due date: 27.07.2022*



I have read and agree with the policy above.

**Name:**

**Signature:**

**Date:**

**Authorised Officer:**