



Canberra Health Services Procedure Fatigue Management

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Purpose

Canberra Health Services (CHS) is committed to the identification, assessment, and management of fatigue related risks. Fatigue management is a shared responsibility between employers and employees in the workplace. This procedure and its associated framework aims to provide safe systems of work and a safe environment for employees, patients and the public by implementing an integrated and proactive approach to provide safe systems of work.

This procedure is to be read in conjunction with CHS' Work Health and Safety Policy. It draws on Queensland Health's Fatigue Risk Management Systems (FRMS) Implementation Guideline and associated documents.¹

Under the FRMS Implementation Guideline **fatigue** is defined as:

"...a state of impaired physical and/or mental performance and lowered alertness arising as a result or combination of physical and mental work, health and psychosocial factors or inadequate restorative sleep." (Schutte 2009)

"It is a decreased capacity for physical and/or mental activity resulting from imbalances of the resources required to perform the activity." ²

The long-term health consequences of shift work and insufficient sleep can include cardio metabolic stress and impaired cognitive function and performance.

CHS employs the following risk management approach to employee fatigue:

1. Identifying the factors that contribute to and increase the risk of fatigue
2. Assessing risks that may occur because of these hazards
3. Controlling or minimising the level of risks
4. Monitoring and reviewing the effectiveness of control measures.

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Scope

This procedure describes CHS' obligations in the management of employee fatigue and applies to CHS employees or contractors of the Canberra Hospital, as well as students on placement.

¹ Queensland Health Fatigue risk management systems (FRMS) Implementation Guideline QH-GDL-401-3.3:2021 https://www.health.qld.gov.au/_data/assets/pdf_file/0033/1137975/gh-gdl-401-3.3.PDF

² Aaronson et al. 1999; Fatigue Risk Management System Resource Pack, Queensland Health 2021

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Section 1 – Principles of Managing Fatigue

Procedure

The following principles apply:

- Fatigue-related risk management is most effective when managed by a shared approach between the employer and employees, with each party discharging their duty to address matters that fall within their responsibility and accountability (refer to Section 5 - Roles and Responsibilities).
- Fatigue risk management will be based on a sound risk management approach using the 'Defences in Depth Model' (referred to the Defences in Depth diagram in the Defences in Section 2 – Defences in Depth), where risks are identified, assessed, controlled and reviewed on a regular basis. The FRMS when implemented recognises the complexity of the services which health services such as CHS provide and acknowledges that there are circumstances where fatigue may be unavoidable but should be further assessed to improve the mitigation of risk.
- The FRMS will incorporate training, education or instruction that:
 - enhance employees' ability to recognise signs of fatigue in themselves and others, and actions that can be taken to manage their own fatigue
 - outline the obligations of all parties to manage workplace fatigue
 - provide an awareness of this procedure and the resources available to help meet the procedure's purpose.
- The FRMS will be integrated with existing work health and safety management systems to achieve consistency and to demonstrate compliance with legislated work health and safety requirements.
- Rostering principles will be consistent with the FRMS, and the relevant Enterprise Agreements.
- Where overtime is a requirement in the workplace, consistent with Worksafe ACT advice, as far as reasonably practical CHS will:
 - Limit overtime to 4 hours for 8-hour shifts
 - Limit overtime to 2 hours for shifts longer than 10 hours
 - Not allow overtime for shifts longer than 12 hours
 - Limit the total hours worked by an employee to no more than 55 hours per week
 - Ensure appropriate breaks between finishing periods of overtime and the commencement of the employee's next shift, in accordance with Enterprise Agreement requirements.

Where any variation to the above occurs, such circumstances should remain consistent with the FRMS, and the relevant Enterprise Agreement.

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- In considering hours and fatigue, CHS will apply the principles set out in the Second Job Procedure to ensure that employees understand their obligations to get sufficient sleep and to be fit for duty.

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Section 2 – Defences in Depth

Procedure

CHS utilises Professor James Reason’s *Defences in Depth* model, as outlined in the FRMS. This model assesses the risk of fatigue by looking at five circumstances (levels of risk) that follow a trajectory that may lead to a fatigue-related incident. Against each of the five levels of risk, are relevant mitigating strategies.

At each level, related fatigue risk factors should be examined, and corresponding control measures applied.



Source: Queensland Health Fatigue risk management resource pack (December 2021) For more detail regarding the *Defences in Depth* model and approach, refer to the Fatigue Risk Management System – Resource Pack

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Each level falls into one of three types of processes:

- **Predictive** (Work Unit assessments – e.g., Assessment of rostering practices and work design)
- **Proactive** (Proactive individual assessments - e.g., fatigue and sleep self-assessments prior to shifts, Supervisor fatigue risk assessment)
- **Reactive** (Reactive assessments – e.g., critical incident investigations and reviewing systems of work).

The principles of the *Defence in Depth* model are similar to the hierarchy of control in that elimination of the hazard or risk is preferred but where this is not achievable, there is a range of control options that have a descending order of effectiveness, with an emphasis on predictive and proactive management.

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Section 3 – Assessing the Risks and Implementing Controls – a Shared Responsibility

Procedure

The successful management of fatigue-related risks relies on a shared responsibility between all parties i.e., managers, employees, contractors and students. As such, assessing and monitoring risks involves a collaborative approach with shared accountability across predictive, proactive and reactive assessments, and control measures. Attachment 1 includes a table which summarises the available assessment tools outlined in the FRMS Implementation Guideline³.

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Section 4 – Additional Risk Assessment and Monitoring Responsibilities – 12-Hour Shifts

Procedure

Worksafe ACT recognises fatigue as a significant workplace hazard, and advises employers to:

- consider whether 12-hour shifts are necessary; and
- not allow overtime for shifts longer than 12 hours.

³ Queensland Health Fatigue risk management systems (FRMS) Implementation Guideline QH-GDL-401-3.3:2021 https://www.health.qld.gov.au/_data/assets/pdf_file/0033/1137975/gh-gdl-401-3.3.PDF

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In addition, where 12-hour shifts are implemented, the following principles apply:

- No overtime hours should occur beyond the 12th hour of an individual shift without assessing the risk and implementing controls.
- Rostering principles must include a mandated period where employees commencing 12-hour shift patterns are required to utilise the IFLS or Energex Calculator⁴ prior to every shift.
- Where staff are choosing to enter a 12-hour shift pattern the pattern should be reviewed at 6 monthly intervals
- Employee’s should consider whether they should utilise the IFLS prior to commuting to work where they feel fatigued prior to leaving home.
- Regular monitoring and review of the rosters’ impact on fatigue must occur on a cyclical basis.

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Section 5 – Roles and Responsibilities

Procedure

Chief Executive Officer (CEO)

- Overall responsibility for ensuring this procedure is implemented in CHS
- Facilitate and promote a positive safety culture to manage fatigue-related risks
- Ensuring that appropriate resources are in place to support this procedure.

Deputy CEO / Chief Operations Officer / Executive Director Medical Services / Executive Director Nursing and Midwifery and Patient Support Services / Executive Director Allied Health

- Facilitate and promote a positive safety culture to manage fatigue-related risk
- Thus helping to ensure
 - identification, assessment and management of fatigue-related risk
 - that available resources are prioritised to reduce the incidence of employee
 - compliance with this procedure.

Executive Directors and Directors

- Leading by example to facilitate and promote a positive safety culture to manage fatigue related risk
- Ensuring identification, assessment and management of fatigue related risk
- Advising the Deputy CEO of any barriers preventing risks being managed to as low a level as reasonably practicable

⁴ The IFLS and the Energex Calculator can be found in the Queensland Health Fatigue risk management systems (FRMS) Implementation Guideline QH-GDL-401-3.3:2021
https://www.health.qld.gov.au/_data/assets/pdf_file/0033/1137975/qh-gdl-401-3.3.PDF

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- Responding appropriately to employee reports of fatigue related incidents, errors or behaviours
- Communicating requirements of this procedure to employee
- Ensuring compliance with this procedure.

Senior Managers / Line Managers / Rostering Officers in Medical Services, Nursing and Midwifery and Patient Support Services / Allied Health

- Leading by example to facilitate and promote a positive safety culture to manage fatigue-related risk
- Ensuring identification, assessment and management of fatigue-related risk, utilising the relevant assessment tools which appear in the FRMS Resource Pack
- Ensuring rostering complies with this procedure, and that fatigue-related issues are assessed prior to the implementation of shift changes
- Responding appropriately to RiskMan employee reports of fatigue-related incidents, errors or behaviours
- Ensuring employees adhere to their Enterprise Agreement or contract of employment conditions which include requirements related to fatigue management: e.g. scheduling of breaks, using leave entitlements, rostering considerations etc. (employees are also encouraged to consider accessing flex time and time-in-lieu entitlements in respect to managing fatigue, where these are applicable under the relevant Enterprise Agreement)
- Making recommendations to their Executive Director or Director, as required, for provision of additional resources to reduce employee fatigue to as low a level as reasonably practicable
- Advising Divisional management of barriers preventing fatigue-related risks being managed at as low a level as reasonably practicable
- Monitoring and management of hours worked by individual employees and work areas to reduce fatigue-related risks to as low a level as reasonably practicable.
- Communicating requirements of this procedure to employees.

All Employees

- Leading by example to facilitate and promote a positive safety culture to manage fatigue-related risk
- Promptly identifying and reporting potential risks associated with fatigue to managers, utilising the relevant assessment tools
- Declaring any additional work undertaken beyond normally scheduled hours, including voluntary and external work, in accordance with this procedure
- Adhering to their Enterprise Agreement or contract of employment conditions which include requirements related to fatigue management: e.g. scheduling of breaks, using leave entitlements, rostering considerations etc. (employees are also encouraged to consider accessing flex time and time-in-lieu entitlements in respect to managing fatigue, where these are applicable under the relevant Enterprise Agreement)
- Assuming personal responsibility for individual lifestyle management to reduce fatigue in the workplace and to be able to conduct work duties in a safe and efficient manner.

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Evaluation

Outcome

CHS employees and contractors will manage the risk of fatigue management in accordance with this procedure.

Measure

Employee compliance with fatigue management and FRMS will be reviewed annually by CHS' Work Health and Safety section.

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Related Policies, Procedures, Guidelines and Legislation

Policies

Work Health and Safety

OHS Risk Management Policy, ACT Government

ACTPS WHS Implementation Policy, ACT Government

Responding to Workplace Accidents and Incidents (ACT Government)

ACT Public Sector Work Health Safety and Wellbeing Policy, ACT Government

ACTPS Work Health Safety Risk Management Policy, ACT Government

Procedure

CHS Work Health Safety Management System (WHSMS)

Second Job

Guidelines

Stresswise – Preventing Work Related Stress, ACT Government (WorkSafe ACT) 2010

Frameworks

Respect Equity and Diversity Framework ACT Government 2010

Legislation

Work Health and Safety Act 2011

Public Service Management Act 1994

Other

- CHS Work Health Safety Management System
- Australian Charter of Healthcare Rights

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1. Guide for Managing the Risk of Fatigue at Work, Safe Work Australia
2. Fatigue Risk Management Systems (FRMS) Implementation Guide, Queensland Health
3. WorkSafe ACT, Work-related Fatigue: [Work-related fatigue - WorkSafe ACT](#)
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Search Terms

Fatigue, tiredness, sleep, risk, work, health and safety

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Attachments

Attachment 1 – FRMS Implementation Guideline Assessment Tools

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Policy Team ONLY to complete the following:

<i>Date Amended</i>	<i>Section Amended</i>	<i>Divisional Approval</i>	<i>Final Approval</i>

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Attachment 1 – FRMS Implementation Guideline Assessment Tools

	Assessment Method / Assessment Tool	When to utilise the assessment	Responsible Officer
Predictive Processes – Level 1 Control	Roster Risk Assessment Matrix , FRMS Implementation Guideline Page 16 (Figure 7)	Where changes to rostering practices are made, or fatigue is identified as a hazard.	Senior Manager/ Rostering officer
	CHS Risk Assessment Template	Where changes to rostering practices are made, or fatigue is identified as a hazard.	Senior Manager / Rostering officer
Proactive Processes – Levels 2 and 3	Samn-Perelli Fatigue Checklist & Control measures FRMS Implementation Guideline: Fatigue Checklist - Page 17 (Figure 8); and Control Measures – pp 19-21 (Table 3)	The Samn-Perelli checklist is a simple tool aimed at prompting further assessment, or the implementation of effective control measures dependent upon the level of risk.	Employee, reported to their supervisor to discuss control measures
	Individual Fatigue Likelihood Score (IFLS) Calculator	The IFLS Calculator is a dynamic fatigue risk assessment to be undertaken prior to shift.	Employee, reported to their supervisor to discuss control measures
Reactive Processes – Levels 4 & 5	CHS Incident Investigation process	Following an incident relating to fatigue	Supervisor or Snr Manager to undertake with a view to reviewing systems
	Fatigue Occurrence Report	Following fatigue related errors	Employee, reported to their supervisor to discuss countermeasures