

# FITNESS FOR WORK DUTY FATIGUE MANAGEMENT PROCEDURE

A374095

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## 1. OBJECTIVE

The objective of this procedure is to assist in the assessment and management of fatigue.

Where another Pilbara Ports procedure includes controls in relation to fatigue management this procedure takes precedence.

## 2. SCOPE

This procedure applies to:

- A person conducting a business or undertaking (PCBU), and all workers working or a PCBU, for or on behalf of Pilbara Ports on a Pilbara Ports site or Pilbara Ports controlled works.
- A vendor's worker may work under their own company's fatigue management procedures if formally agreed.
- Pilbara Ports tenants are required to meet the intent of this procedure, by putting systems in place to manage risks associated with fatigue.

The scope excludes:

- Helicopter operations are outside of Pilbara Ports core business expertise and subsequently Pilbara Ports engages specialist contractors to operate under their own CASA approved fatigue management policies and procedures which, as a minimum, meet requirements of CASA (Civil Aviation Safety Authority) Civil Aviation Order (CAO) 48.1 Instrument 2019, as amended.
- Pilbara Ports employee Marine Pilots operate under their own fatigue management procedures which, as a minimum, meet the requirements of Marine Order 28 (2015) as amended.

Under some circumstances personnel are permitted to work under their own company's fatigue management systems, see Section 10.

## 3. DEFINITIONS

**Table 1: Terms and Definitions**

TERM	DEFINITION
After-hours return to work	Returning to the workplace outside of a workers rostered working hours.
Availability	Employees who receive a written instruction or other authorised direction to remain contactable, but not necessarily immediately contactable by telephone or other means, outside the employee's hours of duty and be available and in a fit state at all such times to provide information, advice and direction via phone or email and would not otherwise require a recall to duty and return to the workplace (i.e. providing technical advice over the phone).
Day Shift	Any shift where most of the hours worked are between the hours of 6am and 6pm.

TERM	DEFINITION
Day Off Work	A day and night in which an employee has not undertaken a shift or attended work for a call out.
Day Work Employee	An employee whose usual work hours are Monday to Friday between the hours of 6am and 6pm.
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 of the internal body clock.
Fatigue Impairment Event	Any situation in which an employee is sent home, or their duties are restricted because of fatigue.
Fatigue Risk Assessment	An assessment of a worker's fatigue conducted with the worker and either a supervisor or member of the health and safety team documented on a Fatigue Assessment Form.
Night Shift	Any shift where most of the hours worked are between the hours of 6pm and 6am.
On Call Employee	An employee that has received written instruction or other authorised direction that the employee is rostered to remain at the employee's residence or to otherwise be immediately contactable by telephone or other means outside the employee's hours of duty in case of a call out requiring an immediate return to duty.
Shift	The time any employee (both shift worker employees and other employees) is undertaking work activities, inclusive of tea and lunch breaks.
Shift Work Employee	An employee whose usual hours are rostered and can occur on any day or time.
Sequence (of shifts)	For this procedure a sequence of shifts is any grouping of three or more consecutive shifts of the same type (i.e., either night shift or day shift).
Significant Event	An event with potential far reaching consequences to the business. Significant Events usually have an Incident Controller appointed to manage the event.

## 4. RESPONSIBILITIES

**Table 2: Responsibilities**

ROLE	RESPONSIBILITIES
Managers, Superintendents and Supervisors	Ensure personnel under their control are aware of, understand and comply with the requirements of this procedure.
Employees and contractors	Comply with the requirements of this procedure.
Visitors	Comply with all reasonable instructions given by your escort.

## 5. FATIGUE

### 5.1 What is Fatigue?

Fatigue can be defined operationally in terms of mental or physical fatigue. Mental fatigue can include a reduced capacity for the brain to operate normally due to either not obtaining adequate sleep or from being awake for too long. Physical fatigue is usually built up by working strenuously or through adverse environmental conditions. It can also develop from sleep restriction or illness.

### 5.2 The Effects of Fatigue

Physical fatigue will generally affect an employee by reducing their capacity to physically work, which will also lead to a deflated desire to work. Mental fatigue has a wider implication in that the brain becomes less able to undertake both simple and complex tasks which affects an employee's safety in any operation or task. Mental fatigue will lead to any of the following:

- Reduced cognition;
- Slowed reaction times;
- Impaired judgement;
- Poor memory function and inability to recall important information;
- A desire to cut corners or omit safety aspects of tasks or functions;
- Lack of resilience to tasks that appear complex or hard to complete;
- Negative moods, intolerance and grumpiness, and
- Micro-sleeps and hypnagogic jerks (head falling/nodding).

All the above can lead to serious incidents depending on the tasks performed. For example, a micro-sleep when driving can lead to a crash at high speed with no avoidance manoeuvre.

### 5.3 Signs and Symptoms

The following signs or symptoms may indicate a worker is fatigued:

- excessive yawning or falling asleep at work;
- short term memory problems and an inability to concentrate;
- noticeably reduced capacity to engage in effective interpersonal communication;
- impaired decision-making and judgment;
- reduced hand-eye coordination or slow reflexes;
- other changes in behaviour, for example repeatedly arriving late for work; and
- increased rates of unplanned absence.

A fatigued worker may also experience symptoms not obvious to others including:

- feeling drowsy;
- headaches;
- dizziness;
- difficulty concentrating;

- blurred vision or impaired visual perception; and
- a need for extended sleep during days off work.

## 6. FATIGUE RISK MANAGEMENT

### 6.1 Identifying Fatigue Risk in Design of Rosters and Working Arrangements

A formal fatigue risk assessment will be conducted and reviewed:

- when new rosters or shift work arrangements are being developed; and
- when significant ongoing changes are required to existing roster or shift work arrangements.

The risk assessment will consider and assess the following risks, as a minimum:

- Roster design risk factors;
- Mental and physical demands of work;
- Work environment conditions, and
- Individual and non-work-related factors.

Each risk will be examined in terms of its impact on:

- Sleep opportunity;
- The length of time individuals are required to be awake; and
- The intensity of the work.

The risk assessment should be conducted by the responsible manager with input from representatives of the work force to whom the proposed new or changed roster or work arrangement will apply.

An appropriately qualified expert can be consulted to ensure any significant changes to the roster or shift work minimises fatigue risk factors. The Health and Safety Manager can be consulted to identify an appropriate expert. At the discretion of the Health and Safety Manager this may not be required where Pilbara Ports have gained previous experience and expertise in implementing similar working arrangements.

The following specific risk factors must be considered when applying fatigue management strategies.

**Table 3: Fatigue Risk Factors**

WORK RELATED RISK FACTORS	PERSON RELATED RISK FACTORS
Sustained mental/physical demands of the job	Travel/commute time to and from work
Complex mental/physical efforts or tasks	Sufficient sleep and recovery away from work, including sleep disorders and ill-health
Level of concentration required	Present state of alertness

WORK RELATED RISK FACTORS	PERSON RELATED RISK FACTORS
Environmental factors such as heat, humidity, noise, vibration etc.	Recent shift work history e.g., consecutive shifts with only short duration breaks, hours of work over previous week
Consequence of human error due to loss of vigilance	Personal physical or mental health factors e.g., medications, family/personal issues affecting sleep over last couple of days
Level of supervision	Recent requirement to participate in sustained heavy physical activity
Monotonous work	Activities and/or use of time while spent away from work

## 6.2 Identifying and Managing Fatigue Risks Associated with Work Activities

The risk associated with fatigue is influenced by specific task demands and environmental factors as discussed in Sections 6.2.1 to 6.2.4. The risk of fatigue and these associated risk factors need to be considered at all levels of risk assessments associated with work activities from departmental risk registers and project risk assessments through to task or personal risk assessments. Where risks of fatigue or fatigue risk factors occur, appropriate controls need to be implemented. See the Hazard Management Procedure for more details.

### 6.2.1 Task Demand – Safety Critical Tasks

Safety critical tasks are those tasks where accidents, errors or omissions could result in serious consequences to the health and safety of workers if an incident was to occur. As fatigue could potentially increase the likelihood of an incident occurring strict controls must be in place to ensure these tasks are not undertaken by personnel impacted by fatigue.

### 6.2.2 Task Demand – Mentally or Physically Demanding Work

Mentally or physically demanding work can cause both mental and physical fatigue and as such should be controlled using adequate breaks in appropriate rest areas, limits on continuous time on task, swapping or changing tasks to reduce the build-up of mental or physical stress and opportunities for employees to stop the task and discuss with their supervisor before safety becomes an issue.

Where physically demanding work results in a worker experiencing physical fatigue (i.e., muscle soreness) which impacts upon subsequent shifts, the worker must notify their supervisor. Any soreness or physical fatigue needs to be considered in their task risk assessments and appropriate controls applied (i.e., limiting time spent undertaking physically demanding work, task rotation, undertaking less physically demanding work) until their body has fully recovered.



## 6.2.3 Task Demand – Monotonous Work

Monotonous work can increase the risk of a worker with a sleep debt build up to have a fatigue event. While undertaking monotonous work workers bodies may involuntarily attempt to catch up on sleep if a sleep debt exists. Monotonous work can be better managed through supplying adequate breaks in appropriate areas, swapping tasks and/or limiting the amount of monotonous work an employee undertakes in a shift.

## 6.2.4 Environmental Factors

Environmental factors that may contribute to employee fatigue need to be identified in risk assessments and controls need to be put in place to manage these hazards. These include:

- Heat, sun, humidity and the resulting dehydration;
- Cold or windy conditions;
- Vibration and noise, and
- Chemical hazards.

## 6.3 Travel and Commute Fatigue Risk

Fatigue can considerably increase the probability and severity of vehicle accidents. Consideration should be given to travel arrangements particularly where workers travel to work sites which are remote from their usual place of residence. Driving long distances at the end of a series of shifts, after long shifts and after a sequence of night shifts should be avoided. Other examples where fatigue needs to be considered includes:

- Non-local personnel returning to their place of residence after working at a remote site, completing project work or completing shutdown projects;
- Driving home after flying for non-local personnel returning from a worksite; and
- Personnel returning from a remote site.

Strategies to reduce risk may include providing a night's accommodation to allow rest before travel, including travel time in the last day's working hours or taking travel time into consideration when setting work hours to allow for 10 hours at the employee's accommodation between shifts.

## 7. PLANNING TO CONTROL FATIGUE RISK

### 7.1 Standard Working Hour Requirements

Table 4 outlines the standard working hour requirements for all employees, contractors and visitors onsite. Travel time should be considered in total work hour calculations.

**Table 4: Standard Working Hour Requirements**

WORK HOURS	GUIDELINE
Maximum hours in a 14-day period	<ul style="list-style-type: none"><li>• No person will work more than 144 hours.</li></ul>

WORK HOURS	GUIDELINE
Maximum hours in a shift	<ul style="list-style-type: none"> <li>12.5 hours</li> </ul>
Break between consecutive shifts	<ul style="list-style-type: none"> <li>A minimum break of 10 hours in suitable accommodation (excluding travel) must be made available.</li> <li>Within every 14-day cycle (starting on the first Monday following Pilbara Ports pay day), as a minimum, people shall be required to have at least 2 days off.</li> <li>For regular rostered nightshift work, the number of days off following successive nightshifts should equal the number of successive nightshifts worked.</li> </ul>
Recall to duty	<ul style="list-style-type: none"> <li>If occurs during 10-hour break period after last shift worked, the 10-hour break will be observed at the end of callout.</li> </ul>
Minimum breaks during the working shift	<ul style="list-style-type: none"> <li>8 hours of work – 1 x 30-minute break;</li> <li>9-10 hours of work – 1 x 30-minute and 1 x 15-minute breaks</li> <li>11-12.5 hours of work – 2 x 30-minutes, or 1 x 30-minutes and 2 x 15-minute breaks.</li> <li>&gt;12.5 hours – additional breaks as per the risk assessment involved for the additional work.</li> </ul>
Maximum number of continuous shifts	<ul style="list-style-type: none"> <li>12 Day shifts; or</li> <li>6 Night shifts.</li> </ul>

## 7.2 Requirements and Approval for Working Long Shifts

Table 5 outlines the requirements and approvals for working long shifts for all employees, contractors and visitors onsite. Travel time should be considered in total work hour calculations.

Long shifts (>12.5 hours) may only be undertaken in non-routine circumstances where there is an operational requirement.

Managers approving long shifts are required to have training in fatigue management (see Section 13) and should take into consideration environmental factors which impact on fatigue (see Section 6.2.4).

Note a fatigue risk assessment is required for shifts exceeding 13 hours (see Section 9.4).

Note working hours exceeding 14 hours are only to be approved in exceptional circumstances or for a significant event.

**Table 5: Requirements and Approval for Working Long Shifts**

WORK HOURS	GUIDELINE
Up to 13 hours worked in a 24-hour period	<ul style="list-style-type: none"> <li>Individual will self-assess their fitness for duty. No formal documented risk assessment is required unless stipulated by other sections of this procedure.</li> </ul>
13 to 14 hours worked in a 24-hour period	<ul style="list-style-type: none"> <li>Notice to be given to the relevant Manager (or delegate) that individual is working more than 13 hours.</li> <li>Completion of a documented fatigue risk assessment involving the worker and their supervisor and/or superintendent/manager, using a Fatigue Assessment Form.</li> </ul>
14 – 16 hours worked in a 24-hour period	<ul style="list-style-type: none"> <li>Approval is to be sought from executive level or the Incident Controller (in the case of work related to a Significant Event) on completion of a documented fatigue risk assessment involving the worker and their supervisor and/or superintendent, using a Fatigue Assessment Form.</li> <li>Travel arrangements must be considered including confirmation of arrival at destination and results of the Fatigue Assessment Form.</li> </ul>
Beyond 16 hours worked in a 24-hour period	<ul style="list-style-type: none"> <li>May only occur in an emergency where there is no other option and a risk assessment has determined that the risk to life and/or safety associated with not doing the tasks outweighs the risks associated with the fatigued person's tasks, and the person's risks do not extend to risk of injury.</li> <li>Requires approval from executive level or the Incident Controller (in the case of work related to a Significant Event).</li> <li>A documented fatigue risk assessment must be completed using a Fatigue Assessment Form.</li> <li>Travel arrangements must be organised by site.</li> <li>Where practicable the Health and Safety Manager should be consulted including hours worked, nature of the emergency, and to provide feedback on the Fatigue Assessment Form.</li> <li>The Health and Safety Manager must keep a record of the decision to allow work beyond 16 hours to proceed including a copy of the Fatigue Assessment Form.</li> </ul>

## 7.3 Requirements and Approvals for Working Extra Shifts

Table 6 outlines the requirements and approvals for working extra shifts for all employees, contractors and visitors onsite. Travel time should be considered in total work hour calculations.

Long shift sequences more than 12 days or 6 nights may only be undertaken in non-routine circumstances where there is an operational requirement.

Managers approving long shift sequences are required to have completed training in Fatigue Management (see Section 13) and should take into consideration environmental factors which impact on fatigue (see Section 6.2.4).

Note a fatigue risk assessment is required for additional shifts beyond 12 consecutive days or 6 consecutive nights (see Section 9.4).

Note sequences of shifts exceeding 13 consecutive shifts are only to be approved in exceptional circumstances or for a significant event.

**Table 6: Requirements and Approvals for Working Extra Shifts**

WORK SHIFTS	GUIDELINE
One additional shift (i.e., 13 days or 7 nights)	<ul style="list-style-type: none"> <li>• Notice to be given to the relevant Department Manager (or delegate) that individual is working more than 12 consecutive days or 6 consecutive nights.</li> <li>• Completion of a documented fatigue risk assessment involving the worker and their supervisor and/or superintendent/manager, using a Fatigue Assessment Form.</li> </ul>
More than one additional night shift (i.e., up to 13 nights)	<ul style="list-style-type: none"> <li>• Notice to be given to the relevant Department Manager (or delegate) that individual is working more than 7 consecutive night shifts.</li> <li>• Completion of a documented fatigue risk assessment involving the worker and their supervisor and/or superintendent/manager, using a Fatigue Assessment Form.</li> </ul>
More than 13 consecutive shifts	<ul style="list-style-type: none"> <li>• Approval is to be sought from executive level or the Incident Controller (in the case of work related to a Significant Event) on completion of a documented fatigue risk assessment involving the worker and their supervisor and/or superintendent, using a Fatigue Assessment Form.</li> <li>• Travel arrangements must be considered including confirmation of arrival at destination and results of the Fatigue Assessment Form.</li> </ul>

## 7.4 Scheduling of High-Risk Work

Consideration should be given, where possible, to preferentially scheduling of high-risk activities to day shifts rather than night shift. Where this is not possible potential fatigue issues should be considered in the task risk assessments. Consideration should also be given to the workers' circadian rhythm, the internal biological clock which regulates the timings of periods of sleepiness and wakefulness throughout the day. While there are variations between workers the

typical adult has their strongest sleep drive between 02:00 and 04:00 in the morning and then again between 13:00 and 15:00 in the afternoon.

## **7.5 Scheduled and Non-Scheduled Rest Breaks**

Employees are expected to take scheduled breaks when they are due or as close as possible to the scheduled time where they were due as permitted by operational circumstances. Breaks should be planned to not allow more than five continuous hours without a break and where possible, at the most appropriate time to best manage employee fatigue. Breaks shall not be accumulated to be taken at the end of a shift.

Non-scheduled breaks may be considered as an option to manage identified fatigue issues. This may only be undertaken with approval of the workers supervisor as an outcome of completing a Fatigue Assessment Form, see Section 9.4 for more details.

## **7.6 Break Facilities**

The workplace will provide opportunities for employees to take breaks in areas that are safe and where environmental factors (see Section 6.2.4) are minimised as far as practicable. At a minimum, there will be opportunities to sit and relax, eat and drink.

## **7.7 Health and Wellness Services**

Pilbara Ports provides services to promote the health and well-being of our employees and their immediate family. This includes access to support services such as an Employee Assistance Program (EAP) to support their mental health. This service is confidential and free of charge.

Contractors and licensees should consider provision of services to support the health and wellness of their employees.

## **7.8 Employee Self-Management and Self-Assessment**

All personnel have a responsibility to present themselves fit for duty for each shift or recall to duty. This includes:

- Having adequate rest and sleep between shifts and before returning to work;
- Managing activities outside of working time to ensure adequate sleep;
- Maintaining a level of health and fitness that minimises fatigue;
- Avoiding alcohol or other drugs and medications (including prescription) that may cause fatigue<sup>1</sup>; and
- Taking any other actions as identified in training.

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<sup>1</sup> See Fitness for Duty Alcohol and Drugs Procedure for more information.

Where a person is concerned about their fatigue, or has external commitments which may result in fatigue, they must report this to their line manager immediately.

### **7.9 Medications**

Any person taking medication, including prescription and over-the counter medications which may cause fatigue must inform their line manager, who must monitor the person's fitness for duty and assign alternate duties wherever appropriate. Refer to Fitness for Duty Alcohol and Drugs Procedure.

## **8. JOURNEY MANAGEMENT**

### **8.1 Travelling to and From Work**

Fatigue can affect a person whilst travelling to and from work. It is the responsibility of all persons onsite to ensure they have a safe method of getting to and from work.

Some controls that may be implemented to assist in the management of fatigue whilst travelling to and from work include:

- Plan and prepare for the drive to or from work, i.e., adequate rest, eating correctly, exercise;
- Conduct a self-assessment to determine if you are fit to drive;
- Carpooling with other work colleagues to assist with the management of a fatigued driver;
- Always allow plenty of time to get to your destination to avoid rushing or speeding;
- Stopping for a short break if feeling fatigued;
- If travelling an extended distance, schedule breaks to assist. The frequency and duration of rest breaks should be determined based on a risk assessment and before getting tired.
- Consider nearby temporary accommodation if your home address is an extended distance from work (i.e., more than one hour); and
- Avoid distractions whilst driving.

Where, by the end of a drive, work plus travel time will have exceed 14 hours then a Fatigue Assessment Form must be completed prior to commencing travel (see Section 9.4.1).

### **8.2 Work Related Travel**

Refer to the Travel Procedure for guidelines relating to Pilbara Ports employees travelling for business purposes.

### **8.3 Journey Management Plans**

Where employees travel for more than one hour to or from the workplace, or for work related travel a journey management plan will be implemented. The plan will be reviewed if there are changes to the travel needs of the employee, or when rosters or shifts are being reviewed or changed. Employees are expected to report changes of living arrangements to their supervisor and Human Resources if it may affect their travel duration.

Where long journeys are undertaken prior to commencement of a roster cycle, supervisors will assess the need to conduct informal/formal risk assessments with the employee prior to the commencement of the working shift.

Pilbara Ports staff should refer to the Travel Procedure for guidelines on development of a journey management plan.

Non-Pilbara Ports personnel may use journey management plans in their own companies' formats if they consider appropriate risks to the nature of the travel such as:

- Road and weather conditions;
- Time of travel;
- Vehicle suitability and condition;
- Food and water provisions; and
- Communication tools and plans.

At a minimum the driver should check in with a responsible person notifying them of the time of departure, travel route, vehicle make and registration, passengers and estimated time of arrival. An agreed process needs to be in place if the driver does not check in within 30 minutes of their estimated time of arrival.

## **9. CONTROLLING AND MITIGATING FATIGUE RISKS**

### **9.1 Employee Reporting Fatigue Symptoms**

Where a person is concerned that they or someone else may in any way be physically or psychologically impaired they are to bring this to the immediate attention of their supervisor or manager who will assess the fatigue risk as described in Section 9.4.

If a person feels they are fatigued, they are accountable to:

Attempt to manage the situation by:

- Reporting to the responsible supervisor or manager any occasions where sufficient rest or sleep has not been obtained;
- Reporting instances of feeling fatigued;
- Doing physical activity such as stretching or walking – using opportunities available within their routine work as much as possible;
- Taking refreshments and approved work breaks;
- Conducting a self-assessment of fatigue prior to completing any travel or starting a journey; and
- Limiting excessive commute times and allowing for adequate breaks during travel.

Seek supervisor approval to:

- Change duties;



- Change the timing of work and meal breaks;
- Rest for a period outside their normal breaks; or
- Stop work if safety is likely to be compromised.

## 9.2 Work Related Sleep Disturbances (On Call or Availability)

Where a worker has had work related interruptions to sleep such as taking work related calls (i.e., when On Call or on Availability) the worker must:

- Self-assess their fatigue level before driving to work using a fatigue observation card. If this self-assessment identifies the need for a Fatigue Assessment Form to be completed, then the worker should contact their supervisor and complete the form before driving to work.

## 9.3 Identifying and Detecting Fatigue

Any employee, contractor or visitor who presents as being affected by fatigue will be required to complete a fatigue assessment using the Fatigue Assessment Form. The responsible Supervisor or Task Coordinator will ascertain the appropriate response following the completion of the risk assessment.

A fatigue field observation card may be used to assist workers in determining if they or another worker may potentially be suffering from the effects of fatigue and requires further assessment of fatigue risk. Where two medium risk or one high risk factors are identified in a Fatigue Field Observation a Fatigue Assessment Form shall be completed.

**Figure 1: Fatigue Observation Card**

FATIGUE FIELD OBSERVATION	LOW RISK	MEDIUM RISK 2+ = RISK ASSESS	HIGH RISK 1+ = RISK ASSESS
Eyes	Open and normal	Slow eye closures	Droopy eyelids
Face	Looking alert, no bags under eyes	Looking tired	Looking sleepy
Posture and Movement	Good upright posture	Poor Posture	Groggy bit wobbly
Concentration	Good concentration and focus	Poor focus or lack of concentration	Inability to focus attention for more than a few seconds
Mood	Good mood	Intolerant, irritable, moody	Grumpy, agitated

## 9.4 Assessing Fatigue Risk

A Supervisor's assessment concerning physical or psychological impairment of a worker may be based on job performance, physical appearance (e.g., looking tired), through knowledge gained of an individual or by the worker's behaviour. Examples of situations where impairment may be suspected include:



- Where a worker shows obvious signs of abnormal physical distress or unusual behaviour while doing what is otherwise normal work;
- Where a worker is not capable of meeting performance and standard criteria following training for a job competency within the employee's job description; and
- Where a worker's job performance is below acceptable standard and the employee has previously been assessed as competent in performing the tasks.

If a person exhibits signs of or notifies that they are fatigued, the supervisor will discuss a solution and conduct a fatigue assessment with the person, taking risk factors associated with the task into consideration. The supervisor and employee will consider the following:

- Allowing the person to continue working with increased supervision or assistance from a co-worker;
- Allowing rest, nap, or meal break.
- Allocating other equipment or duties (including task rotation) to the person; or
- Remove the person from the workplace.

The supervisor shall complete the Fatigue Assessment Form. If the supervisor has reason to suspect the impairment is due to drugs and/or alcohol, then the Fitness for Duty Alcohol and Drugs Procedure should be followed.

When a fatigue event occurs the Health and Safety Manager shall be notified by email and a copy of the Fatigue Assessment Form Attached. This information should then be forwarded to Human Resources and filed in the employee's personal file. All information concerning physical or psychological impairment will be treated in a confidential manner.

#### **9.4.1 Fatigue Assessment Form**

The Fatigue Assessment Form shall be completed when:

- an employee reports they are fatigued;
- a supervisor or peer observes signs or have concerns that an individual is fatigued (see Section 5.3 for signs and symptoms of fatigue); or
- when required in Section 8.1 or 12 of this Procedure.

#### **9.4.2 Transport Home for Fatigued Workers**

When the decision is made to remove a worker from the workplace due to fatigue the supervisor who undertook the fatigue risk assessment is to instruct the worker not to drive and ensure that the worker has a safe means of transport to their accommodation. Consideration should be given to causing further fatigue to workers by delays in provision of this transport.

Serious vehicle accidents due to fatigue are known to have occurred in the community even with very short drives. As such workers who, by a fatigue risk assessment, are found to be 'Almost Certain' to have a fatigue event or report that they are feeling fatigued shall not be allowed to drive themselves home. Alternative arrangements must be made whereby a non-fatigued driver transports the worker home. Where a worker refuses to comply with this requirement it shall be reported to Human Resources and addressed as a performance management issue.

Where required arrangements should be made to assist the worker to return to work after resting to get their vehicle.

#### **9.4.3 Completion of Fatigue Assessment Forms outside of Supervisor Availability**

Where a requirement to complete a Fatigue Assessment Form is triggered by this procedure and it is outside the standard working hours of the supervisor responsible for completing the form and the supervisor is either:

- uncontactable; or
- contacting the supervisor is likely to disrupt their sleep.

Two options are available in this circumstance, the worker may either:

- Complete a Fatigue Assessment Form and have it reviewed by a colleague (preferred option); or
- Complete a self-assessment of fatigue recorded on a Fatigue Assessment Form and provide it to their supervisor at the next available opportunity. This should only be undertaken where no-one is available to review the assessment.

#### **9.5 Provision for Medical Assessment on Suspicion of Impairment;**

An employee who has had more than two fatigue impairments noted in a period of 6 months may be referred by their line manager to a Medical Practitioner for assessment or the EAP. Further action may be required dependent on the doctor's 'Fitness for Duty' report or EAP advice. It is the responsibility of the employee to advise their line manager or any required action.

### **10. CONTRACTORS AND VISITORS**

All contractors and visitors on Pilbara Ports controlled sites or working for Pilbara Ports are subject to the same conditions and expectations as Pilbara Ports employees and will adhere to this Fatigue Management Procedure, unless otherwise stated and agreed upon as part of the contract company's safety management plan review.

#### **10.1 Prior Work History**

Work history needs to be taken into consideration when assessing compliance with this procedure.

Workers should either:

- have had a break between shifts that meets or exceeds the requirements of this procedure for their most recent work history; or
- ensure that previous work history plus work undertaken on Pilbara Ports controlled sites or for Pilbara Ports meets the requirements of this procedure if the worker has not had a break between shifts prior to commencing work.

## **11. COMMERCIAL VEHICLE DRIVERS**

Commercial vehicle drivers accessing Pilbara Ports sites to load or unload cargo are excluded from the requirements of this procedure if they operate under their own company's fatigue management policies and procedures which meet the requirements of the Code of Practice for Fatigue Management for Commercial Vehicle Drivers (2004).

## **12. PILBARA PORTS OPERATIONAL WORK SCHEDULES AND ROSTERS**

### **12.1 Shift Work – Equal Time Shift Rosters**

The following conditions apply to Port of Port Hedland Terminal Operations Team, Vessel Traffic Services and Utah Bulk Handling Facility Maintenance Team:

- minimum break between shifts shall be sufficient to allow for 10 hours at the workers accommodation;
- any work outside the standard shift cycle (i.e., equal time fixed roster) shall be authorised and agreed by a line manager;
- except for emergencies or urgent operational need, at least 24 hours' notice should be given before night work;
- shift workers shall not exceed a maximum of 7 consecutive day shifts or 6 consecutive night shifts without taking a break of at least 24 hours for day shift or 48 hours for night shift;
- individual day or night shifts (i.e., training days) may be completed between two sequences of shifts if they have had at least one 48-hour break or two 24-hour breaks between sequences; and
- shift workers may work more than 12 hours, where work hours exceed 13 hours approval and risk assessment requirements will apply as described in Section 7.2. If an employee works more than 14 hours Pilbara Ports shall offer transport home. Accepting transport may be mandatory as determined by a Fatigue Assessment Form (see Section 9.4.1 for more details).

The Fatigue Assessment Form shall be completed when:

- a shift exceeds 13 hours;
- prior to commencement of a workers fifth or more consecutive night shift;
- prior to commencement of any night shifts undertaken outside of their normal night sequence (i.e., filling in for a single shift during a rostered break); or

- prior to attending after-hours return to work or returning to work for their next shift after undertaking work because of a callout or undertaking work from home (i.e., workers who are On Call or on Availability who have had to respond to work calls).

### 12.2 Shift Work – All Sites and All Rosters Not Covered by 12.1

Shift Work employees are employed in a variety of roles that are categorised as 24 hours operational. The following conditions apply to Pilbara Ports shift work employees where practicable:

- minimum break between shifts shall be sufficient to allow for 10 hours at the workers accommodation;
- any work outside the standard shift cycle (i.e., equal time fixed roster) shall be authorised and agreed by a line manager;
- except for emergencies or urgent operational need, at least 24 hours' notice should be given before night work;
- shift workers shall not exceed a maximum of 12 consecutive day shifts or 6 consecutive night shifts without taking a break of at least 24 hours<sup>2</sup> for day shift or 48 hours for night shift;
- individual day or night shifts (i.e., training days) may be completed between two sequences of shifts if they have had at least one 48-hour break or two 24-hour breaks between sequences; and
- shift workers may work in excess of 12 hours, where work hours exceed 13 hours approval and risk assessment requirements will apply as described in Section 7.2. If an employee works more than 14 hours Pilbara Ports shall offer transport home. Accepting transport may be mandatory as determined by a Fatigue Assessment Form.

The Fatigue Assessment Form shall be completed when:

- a shift exceeds 13 hours;
- prior to commencement of a workers fifth or more consecutive night shift;
- prior to commencement of any night shifts undertaken outside of their normal night sequence (i.e., filling in for a single shift during a rostered break); or
- prior to attending after-hours return to work or returning to work for their next shift after undertaking work as a result of a callout or undertaking work from home (i.e., workers who are On Call or on Availability who have had to respond to work calls).

### 12.3 Day Work

The following conditions apply to Pilbara Ports day work employees where practicable:

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<sup>2</sup> Note: See Section **Error! Reference source not found.**, Table 4: Requires at least 2 days break in any 14-day cycle

- minimum break between shifts shall be sufficient to allow for 10 hours at the workers accommodation;
- any work outside the standard shift cycle sequence shall be authorised and agreed by a line manager;
- day workers required to undertake night shifts should be given at least 24 hours notice if practicable;
- day workers shall not exceed a maximum of 12 consecutive day shifts or 6 consecutive night shifts without taking a break of at least 24 hours<sup>3</sup>; and
- day workers should not work more than 13 hours. Where work hours exceed 13 hours approval and risk assessment requirements will apply as described in Section 7.2. If an employee works more than 14 hours Pilbara Ports shall offer transport home. Accepting transport may be mandatory as determined by a Fatigue Assessment Form (see Section 9.4.1 for more details).

The Fatigue Assessment Form shall be completed when:

- a shift exceeds 13 hours;
- prior to commencement of night shifts; or
- prior to attending after-hours return to work or returning to work for their next shift after undertaking work as a result of a callout or undertaking work from home (i.e., workers who are On Call or on Availability who have had to respond to work calls).

### 13. TRAINING AND EDUCATION

All employees, contractors and visitors will be informed of the Fatigue Management Procedure and will be provided with the necessary information required to manage fatigue. Pilbara Ports will review and as necessary revise the information provision, such that it remains relevant and effective.

The Fatigue Management Procedure and fatigue related hazards will be communicated and assessed through:

- Induction – New employees or contractors will be provided with training regarding the rules associated with the management of fatigue;
- On boarding - Managers and/or supervisors on appointment or promotion;
- Education and awareness – to be included as part of site training plan. Further detail on subjects that may be presented are explained in Section 13.1;
- When changes are made to the Fatigue Management Procedure; and
- Roster changes – All affected will be consulted regarding any changes to rosters, shifts or fatigue requirements.

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<sup>3</sup> Note: See Section **Error! Reference source not found.**, Table 4: Requires at least 2 days break in any 14-day cycle

## 13.1 Fatigue Management Education and Awareness for all Personnel

Subjects within the training may include but not limited to:

- Information on fatigue, what causes it and how it can affect people;
- Information on health effects of shift work and sleep restriction;
- Common terminology used in the Fitness for Duty Fatigue Management Procedure;
- Practical information on how to get better sleep and transitioning between night and day shifts;
- How to report fatigue problems and use the recommended EAP or health services available;
- Information on countermeasures such as caffeine, breaks, lighting;
- Information on management of fatigue and employee and supervisor responsibilities;
- Considerations for a safe and healthy diet and eating habits; and
- Managing fatigue and alertness levels; and
- Balancing work and home life.

Refresher training in the above topics should occur at intervals no greater than 2 years.

## 14. RECORD MANAGEMENT

Each department is responsible for keeping records of Fatigue Risk Assessments associated with work done by employees or contractors in line with Pilbara Ports Recordkeeping Plan.

## 15. MONITORING

### 15.1 Monitoring of Hours

Each department is responsible for monitoring compliance with working hour guidelines and the requirements of the Fitness for Duty Fatigue Management Procedure.

### 15.2 Management of Employees Exceeding Work Hours

Where it is identified that people are in breach of the working hours guidelines, an investigation will be conducted, and strategies put in place to prevent reoccurrence. Disciplinary action may be considered where wilful breaches of this procedure create health and safety risks.

### 15.3 Review of Working Hours and Compliance

Monitoring and review of the Fitness for Duty Fatigue Management Procedure and controls will occur through the following:

- Incident investigations should consider if fatigue is a potential causal factor where relevant;
- Review of hours/shifts worked with reference to working hours guidelines;
- Critical control monitoring information;
- Personnel health trends, and

- Absenteeism records and trends.

Controls for managing fatigue will be reviewed proactively on a regular basis or whenever audits, monitoring results or serious incidents indicate that risks are not adequately controlled.

The Health and Safety Team will maintain a record of every occasion in which a person remains on duty in excess of 16 hours and shall specify in the fatigue register the nature of the emergency.

#### **15.4 Contractor Fatigue Compliance Review**

Contractors at this workplace must comply with this Fatigue Management Procedure unless this is clearly stated and agreed upon as part of the contract company's safety management system plan review. Access will be provided to this document.

Contractor compliance with hours of work will be monitored and reviewed as part of the regular working hour and compliance reviews.

#### **16. CONSULTATION**

A Fatigue Risk Management Workshop was conducted on 16 July 2019. The workshop was facilitated by an external expert in sleep and fatigue management, Dr Nicholas Mabbott B. Psych. PhD of Beyond Midnight Consulting, and was attended by representatives of various work groups at Pilbara Ports. A copy of the report and a record of attendees can be found on Objective (A764768).

This procedure was reviewed in response to the workshop outcomes and then distributed to workshop attendees and representatives of the workforce for review. A record of consultation on the draft procedure has been saved on Objective (A772217).

#### **17. REFERENCES**

Commission for Occupational Safety and Health (2006) Code of Practice Working Hours

Fatigue Assessment Form

Fitness for Duty Alcohol and Drugs Procedure

Injury Management Procedure

Safe Work Australia (2013) Guide for Managing the Risk of Fatigue at Work

Travel Procedure

#### **18. PROCESS OWNER**

The Health and Safety Manager is responsible for this procedure.