

Health and Safety Information

**HSI
39**

Tiredness & Fatigue Guidance



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1. Introduction

Fatigue “a state of perceived weariness that can result from prolonged working, heavy workload, insufficient rest and / or inadequate sleep”.

It can result in tiredness and a reduced ability to perform work effectively.

Following concerns raised about employees working excessive hours, becoming fatigued and posing a risk to themselves and / or others, Thames Water introduced a 16hr working time limit within a 24hr period. This has been benchmarked against other utility companies.

It is also supported by studies conducted by the HSE, which concluded that after 12hrs of continuous working the likelihood of having an incident doubles and after 16hrs it triples.

We have listened to the feedback from many areas of the business and developed this guidance document to assist managers, teams and employees with some of the local challenges and frequently asked questions.

It is recognised that implementing the 16hr limit in a 24hr period may have direct environmental, customer, operational or performance impact but we must strive to keep our people safe, healthy and well every day.

2. Key Messages

We do recognise there are many different scenarios that arise during the working week. This document therefore provides the over-arching principles we should adopt; it is also important we continue to comply with our HR policies.

- **Always** consider Fatigue when planning work and shift patterns
- **Plan work** so that no one is scheduled to work more than 12hrs (excluding handover time). If someone is potentially required to work longer than 12hrs, a discussion is needed with their manager and a risk assessment is to be conducted.
- **Complete** a 12hr risk assessment to review the effects of fatigue on work activities.
- **Continue** to assess situation with a formal review at 14hrs, escalating to a Grade C manager to inform of need to review getting controls in place to avoid 16hr working.
- **Stand down** anyone who shows signs of fatigue
- **Empower employees to stop work** if they become tired and fatigued

3. 12-Hour Fatigue Risk Assessment

As a result, we introduced a fatigue policy in 2017 - which remains in place today. This policy states that if anyone needs to work for more than 12 consecutive hours, they must contact their line manager, the Out-Of-Hours Coordinator, Operational Customer Manager (OCM) – (tel: clean 07747643190; waste 07747642853), Incident Manager (tel: 01189 531 313), or Assistant Incident Manager, (all hereinafter referred to as the “Out of Hours Authority”), to have a conversation, undertake a risk- assessment and agree what steps need to be taken to ensure their safety.

This includes agreeing whether they carry on working or not and for how long taking into account the individual’s circumstances and the operational situation, up to a limit of 16 hours. Importantly this is aimed at people being aware of the impacts of fatigue and feeling that if they are unable to continue working due to fatigue they should be able to raise this.

Where any employee is in the extraordinary or unlikely position where they may need to exceed 16 hours work, the Out of Hours Authority must have a direct intervention from a Regional Manager C Grade or above, (formerly ML4 Grade).

- When 12 hours of accumulated working time is approaching, an individual must contact their line manager, or Out of Hours Authority to complete a risk assessment. This risk assessment must be recorded on the **12 Hour Risk Assessment** form.
- Upon completion of the risk assessment, the line manager, or Out of Hours Authority should use this as a

prompt to plan how the individual concerned will be back home within 16 hours (working beyond this is exceptional). This should include:

- A review of the task priority/completion time,
 - The return journey time for the individual and
 - The identification of a replacement if required.
- If at 14hrs, the individual(s) are still working, a 14hr risk assessment review must be undertaken by the Area Manager C Grade, (formerly ML5 Grade), or Out of Hours Authority. If it is likely that work activity could extend beyond 16hrs, this must be escalated to a Regional Manager C Grade, (formerly ML4 Grade), to ensure actions are put in place to avoid 16hrs working.
 - If an individual has returned home after 12 hours of accumulated working time, they should not be called out again wherever reasonably practicable. In the exceptional circumstances that they are required to complete additional work then a risk assessment must be completed first.
 - Those who have been stood down are encouraged to turn off their mobile phones to reduce the risk of additional disturbances.

Please note individuals are the best judge of their own fatigue and have the responsibility and the right, at any time, to stop work regardless of working time and complete a risk assessment if they feel fatigued and believe it is unsafe for them to continue.

- The line manager or Out of Hours Authority are responsible for completing the 12hr risk assessment and mitigating the risk of excessive fatigue on employees post the 12hr working period.
- The line manager or Out of Hours Authority must immediately escalate any concerns to the respective senior manager (a Regional Manager C Grade, formerly ML4 Grade) where there is any likelihood that an employee could exceed the 16hr max working limit.
- Regional Managers C Grade or above, (formerly ML4 Grade), are responsible for taking action to minimise the risks and impacts of fatigue on the employee(s) working beyond the 16hr max limit. Their actions may include making safe / halting work activities whilst replacement personnel are made available.
- The 12hr Risk Assessment Form can be used on desktops or mobile devices.

Click here for the [12 Hour Risk Assessment](#)
Once accessed, please save the link to your favorites or bookmarks. Or use the QR code.



4. Calculating Start and Stop Times

For fatigue purposes only start and stop times should begin when you leave home and end when you arrive home. This doesn't change the calculation of Compulsory Rest Period (CRP) please see more [details here](#).
Short duration disturbance

Whilst undertaking an Out of Hours roster the employee may be contacted, but following discussion, not be required to return to work. These disturbances should be considered when reviewing fatigue.

5. Proactive Mechanism to Support Compliance

Line managers should consider proactive mechanisms that can be put in place, both routinely and on an ad-hoc basis to mitigate the risk of 12 hours being breached. Examples of this include:

- Ask the Out of Hours Authority to complete the fatigue risk assessment out of hours to prevent the on call Out of Hours Authority being woken and then breaching the rules themselves

- Incorporate out of hours planning into daily routine e.g., examples from the second appendices can be daily / weekly / monthly tasks
- Create a second layer of standby where resource allows with continued compliance to other policies / working agreements
- Review standby rosters and ensure fully resourced.
- Share standby coverage within the same geographical area across business areas (i.e., waste treatment support pumping and vice versa)
- Ensure the correct levels of priority are attached to the work and that a response on standby is really needed.
- Review what work is being done as two-person jobs that don't need to be.

7. Methods for Managing Working Time

Line managers should routinely check the working times of their team to identify any trends in out of hours working. The purpose of this is to support employees who might be at risk of accumulating significant periods of out of hours disruption, leading to fatigue.

8. Frequently Asked Questions:

Q: Does the 16hr rule apply to our supply chain partners?

A: Currently no, however many do already apply this principle to working safely. Each supply chain partner has been asked to review and consider their approach to tiredness and fatigue management.

Q: Does the 16hr rule apply to people managers who are on call, sometimes known as the OHC?

A: Yes, it is recognised that being on call can be a challenging role. People who work out of hours to co-ordinate work or sometimes visit site must also follow the guidance, complete the 12hr risk assessment and not work beyond 16hrs. Taking phone calls at home for less than 30mins would be classed as disturbance and not working in line with company HR policies, however people on call should plan their week to avoid traveling early, utilising the opportunity to work close to home if appropriate and take CRP the following day if required. Your line manager will be able to support you on this.

Q: What should I do if I feel tired at any time?

A: Stop work, inform your manager or Out of Hours Authority. As a result, appropriate action can be taken which could include completing the fatigue risk assessment, replacing you on site and ensuring that you are able to return home safe.

Q: When does the following 24hr period start?

A: The 24-hr period starts at the beginning of your normal working day in line with your contract, or at the start of the day following the application of the normal CRP guidelines. It is important you follow the CRP guidance.

Q: What should I do if I am on site and could exceed 16hrs when including my drive home?

A: The 12hr Risk Assessment is key and should set out your plan to ensure you do not exceed the 16hr period - this should include regular reviews to assess if you are becoming more fatigued, update on the allocation of additional resource etc. It's key that you take responsibility also for this plan. The Regional Manager C Grade, (formerly ML4 Grade), or delegated responsible person may have to make the decision to halt activities, arrange transport to your home location etc. whilst alternative arrangements

and/ or replacement personnel are made available

Q: What should I do after I have completed a 12hr risk assessment?

A: The 12hr Risk Assessment should set out your plan to keep you safe and is required to be formally recorded at this point. You should work in line with that plan and if anything changes escalate immediately to the responsible manager.

Example scenario

I start at 12:00pm on Friday and work through the day and evening until 00:15am on Saturday morning after having completed the 12hr risk assessment. After taking CRP I start work at 08:30am when I am called out and I feel fine, returning home at 16:30, if I had continued to work, I could have continued to 20:30 before undertaking a further 12hr Risk Assessment.

In this case, having had suitable rest the prior night I can continue to work safely for an additional 4hrs before needing to do a 12hr risk assessment.

Q: If I feel tired in the time before I reach 12 hrs should I escalate the issue to the appropriate manager?

A: You should always escalate at any time you feel tired.

Q: Is the 16hr limit continuous?

A: It is 16hr within a 24hr working period.

Q: Is the standby, call out and out of hours joint agreement affected by the 16hr limit?

A: No, the 16hr limit works in line with the 2012 joint agreement which details information about compensatory rest, together protecting the safety of all.

Q: If I wake up and am still tired after working several days on standby and after my normal morning routine, what should I do?

A: Contact your supervisor / manager who will be able to advise you on next steps.

Example Scenario

I live in south London and have meetings all day in Reading. I leave home at 05:00 and arrive at work at 06:00, following a day at work I leave the office at 16:30.

Q: Should I complete a fatigue risk assessment; I am also the Out of Hours Authority?

A: The 12hr risk assessment and 16hr limit apply to all areas of our business, there are no exceptions and the same principles outlined in the Fatigue Policy and this guidance should be applied consistently across our business.

Q: When do I start work on out of hours at the weekend?

A: If your first call is at 10:00am and lasts more than 30mins this constitutes as working and your clock has begun 'ticking'. If less than 30mins this is classed as disturbance.

Document Control

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Summary of changes to this version:	Removal of OCDM role references and inclusion of Out of Hours Authority (collective name for Out of Hours Coordinator, Incident Manager & Assistant Incident Manager roles), new management grades, and contact telephone numbers.
Please complete a Change Request Form for any identified changes required to this document.	