

General comments

Please provide any general feedback about the draft model Code.

I have provided comments in the file as this would afford more context and would be easier to read in terms of comments review. I am also attaching a proposed adjustment to the provided fatigue risk chart just to emphasize the importance of hazard identification and risk assessment as an integral initial part of addressing fatigue in the workplace.

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Comments on specific sections

You can comment on as few or as many specific sections as you like.

1. Introduction

Click or tap here to enter text.

1.1 What is fatigue?

Click or tap here to enter text.

1.2 How fatigue causes harm

Provided proposal for the risk chart

Highlighted box:

1. For each 24-hour period
2. On data from WHO, please include year when data was quoted from
3. Replace first “where” to “when”

On the heading **Safety risks from fatigue-related incidents**

Should this be **Safety incidents from fatigue-related risks?** – this addresses the cause and effect of the terms risk and incident. The heading seem counter intuitive, or maybe that is just how I am reading this.

On the first bullet it reduces workers capacity, recommend edits for clarity

It reduces worker’s self-preservation instinct. I am thinking that since the topic is about safety risk, considerations on reduced worker productivity should be transferred to a different section of the document

On the bullets on errors of professionals, recommend edits for clarity

Errors on technical decisions ,...

On the bullet slipping while operating plant or tools or falling when performing tasks requiring balance and coordination such as when working at heights, recommend rearrangements for clarity

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Failure in performing tasks requiring balance and coordination such as in operating plant or working at heights

1.3 WHS duties to manage fatigue risks

Under Hazardous Manual Tasks, inserted other hazards - Could be heat, foul smell or other physical hazards. Could be blood or products that worker is uncomfortable to handle and was not in the job description of the worker

On items in the highlight box

In the discussion of work which is physically and/or psychologically demanding – query: Can the concept of sustained or sudden intense physical or psychological demand be included as repeated surpassing of a person’s limit may trigger fatigue if worker is unable to adapt.

2. Risk management process

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2.1 Leadership and management commitment

On Assess Risk – query on the statement this step may not be necessary if the risks and controls are known : Suggest removal since even if risks and controls are known, if it is not written, then it will be of limited value. Assessing the risk is also something that should be regularly reviewed even if has already been done hence risk assessment will always be a necessary part of risk management.

2.2 Consulting throughout the risk management process

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3. Identify hazards

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3.1 Risk of workers becoming fatigued

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3.2 Health and safety risk from fatigue

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3.3 How to identify fatigue-related hazards

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4. Assess the risks

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4.1 When should you assess the risks?

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4.2 How to assess the risks

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5. Control the risks

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5.1 Combination of control measures

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5.2 Preventing fatigue

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5.3 Managing health and safety risks from fatigue

On the highlight box. For the statement Where workplace napping is used as a control for fatigue workers should be provided with a suitable space (e.g. quiet, temperature controlled and away from customers, clients or patients – query: Should the bed be also looked into? E.g. change of linens (prevent passing of skin disease if multiple users will be using the same napping area), position during napping (flat bed vs recliner).

5.4 Fatigue duties shared with workers

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5.5 Other persons

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5.6 Implementing control measures

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6. Maintain and review control measures

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7. Record keeping

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Appendix A – Resources

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Appendix B – Risk management chart

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Appendix C – Case Studies

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