

4 General comments

Please provide any general feedback about the draft model Code.

The code has improved since last revision and while this code can be applied to all industries and workplaces, it is not intended to provide information relevant to any specific industry. This must be considered during the review process with increased emerging issues such as flexible working arrangements, right to disconnect, gig economy, climate change developments and new technology.

Specific consultation in relation to ONRSR and NHVR should occur for detailed support mechanisms to support specific arrangements and would there be potential to integrate practices to accommodate a overarching approach.

5 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?

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1.2 How fatigue causes harm

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1.3 WHS duties to manage fatigue risks

Pg 8 – Consider under PCBU duty list

The provision of fresh drinking water to prevent dehydration.

The provision of shade and access to air-conditioned site offices on construction sites.

Pg 9 – Psychosocial hazards are hazards that arise from:

Exposure to extreme heat.

Pg 9 – Consider under Hazardous manual tasks list

Unsafe/unergonomic workstation setup.

Sustained sedentary posture.

2. Risk management process

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2.1 Leadership and management commitment

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2.2 Consulting throughout the risk management process

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3. Identify hazards

Consider that fatigued workers more likely to sustain poor posture at a workstation

3.1 Risk of workers becoming fatigued

Pg 17 – Consider under Exposure to other psychosocial hazards

Restructure resulting in uncertainty about job retention. Also workers with short term contracts are likely to have increased stress and poor sleep each time their contract is nearly over.

Pg 17 – Consider under Poor physical environment

No fresh drinking water available

3.2 Health and safety risk from fatigue

Greatest where workers drive long distances as part of their work or spend most of the time driving around. For example, Uber and sales representatives.

3.3 How to identify fatigue-related hazards

Pg 19 – You can seek information on fatigue-related hazards from – focus groups, incident reports, fatigue risk assessment tool for completion by workers having shifts or 10+ hours for 3 or more days or working 3 or more consecutive night shifts.

Pg 20 – Consider under Workplace inspection and observation

Fatigue related hazards can be identified by observing the ergonomics of workstations. If workers sustain awkward postures straining their back, shoulders, neck or wrist they will become fatigued.

Ergonomics of the seat position in company owned vehicles should be assessed during inspections. If workers use their own car providing checklist to ensure their car seat provides sufficient lumbar support. A seat cushion for the driver can be purchased for minimal cost to reduce the risk of lower back pain.

Ventilation and temperature in offices, meeting rooms.

Integrate into the statement at the bottom of Pg 20 – Workers may have increased absenteeism

Pg 22 – Consider revising point one under Monitoring to

Monitor the workplace conditions to minimise fatigue (e.g. workstations that are not set up safely with old or damaged chairs without adequate lower back support and at adjustable height if workers who are tall or short hot desk.

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

Pg 23 – Consider adding to Fatigue hazards example

Dehydration and effects of heat stress increase risk of fatigue and if not managed can result in life threatening heat stroke requiring hospitalisation.

5. Control the risks

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5.1 Combination of control measures

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5.2 Preventing fatigue

Pg 29 – Consider adding to Environment

Ensure drinking water is available by a water fountain or portable water coolers or filtered water tap on sinks.

5.3 Managing health and safety risks from fatigue

Pg 30 – Stimulants

Consider that coffee, tea and other caffeine based drinks dehydrate which if working in hot conditions will increase the effects of fatigue.

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

Consider research and adoption of The OHS Body of Knowledge - Chapter 20: Fatigue

Version published in 2020 – Link: [20 Fatigue](#)

Appendix B – Risk management chart

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Appendix C – Case Studies

Considering a Case Study on emerging issues such as gig economy or flexible work

Events management (arts, entertainment or sports) would also be good.

But the range of examples provided is excellent.