



2nd December 2024

Via Email psychosocialpolicy@swa.gov.au

RE: CONSULTATION – DRAFT MODEL CODE OF PRACTICE: MANAGING FATIGUE RISKS AT WORK

The Ambulance Employees Association (AEA) of South Australia would like to thank Safe Work Australia for developing the model Code of Practice, and for the opportunity to provide feedback. The AEA is a Union representing members involved in the delivery of Ambulance services in South Australia. The AEA is highly supportive of this step towards a strong framework to help guide PCBUs on the strategic prevention and management of work-related fatigue.

Our members work across a 24-hour day, every day of the week, performing safety critical work for a service providing emergency pre-hospital healthcare. AEA members face a unique combination of fatigue risks in the workplace. AEA members work long hours performing cognitively complex tasks, including performing life-saving interventions and driving long distances, often during low body clock periods. Our members are often at risk of injury from fatigue, both physical and psychological.

Unions have comprehensive insights into systemic fatigue issues their members face and can be a valuable resource for PCBUs in identifying fatigue-related hazards. The AEA believes control measures should be expansive, such as incorporating additional break times during low body clock periods (e.g., 0200–0600), monitoring abstraction and absence rates to plan for unplanned absences, and ensuring tasks are assigned to workers who have recently had adequate rest. Additionally, shift workers, particularly those working during fatiguing hours (e.g., 2200–0600), can have reduced fatigue risks through the provision of adequate rest facilities.

To enhance the effectiveness of the Code, language emphasising PCBU obligations in managing fatigue risks can be utilised to reduce the risk of underreporting. Finally, the Code should emphasise that managing fatigue is not solely the responsibility of workers. Moving further away from an overreliance on individuals to self-manage fatigue risks and towards the implementation of robust systems to reduce fatigue-related hazards is essential in protecting workers from fatigue risks at work.

Please find our detailed feedback in the attached document. Should you wish to discuss this feedback in more detail, please do not hesitate to contact myself on this matter.

Yours sincerely

Russell McQuade
Industrial Officer

