

4. General comments

Please provide any general feedback about the draft model Code.

Fatigue Prevention

The emphasis appears to focus on work-caused fatigue. Section 3.1 includes a number of contributing external factors to being fatigued at work but the strategy of starting work well-

rested is not adequately explored. It is also covered in the very last items of Annex B (this seems to show how the matter is being considered - perhaps because PCBU are made to focus on 'work' activity. It is good to see reference to extended commutes.

The reality of less quality sleep time is becoming more common as more workers are searching for increased paid time due to cost-of-living pressures. Contributing factors could include:

- Single parenthood/care responsibilities
- Second job
- Invasive hand-held technology
- Additional physical exertion (eg 'working out' at a gym)
- Commute time between work and affordable housing

In our military, its members can undertake some outside employment as long as it is approved and will not interfere with primary duties. This includes ensuring that adequate rest continues. It follows that the PCBU should have a say in how much additional work (ie less rest) the worker is receiving. Externally caused fatigue should not be brought to the workplace to potentially endanger that worker and others.

Well-rested workers are more likely to be attentive and more resilient, so (without detracting from effective design of work) I suggest the emphasis should be equally about planning and addressing prevention of fatigue issues at work such as:

how much **sleep** is needed prior to a period of tasking/shift, given the nature of the task and working environment

How to design and implement effective 'barrier controls' that prevent a fatigued worker from starting a shift/task - as a matter of incapacity (they are the same as sick/under the influence etc)

Enforcement of adequate **sleep** when planning to undertake High-Risk work

(additional comments at 3.1 and Annex B)

5. Comments on specific sections

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

1. Introduction

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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

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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

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3.1 Risk of workers becoming fatigued

(as comments above)

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

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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

'Individual hazards' cover the main aspects of external causes but it should be treated as much as form 'at work' and I suggest these 'individual risks' should be listed first

Appendix C – Case Studies