Managing rail staff fatigue

4. Basic fatigue controls

4.1 All dutyholders need to have basic arrangements in place to reduce, so far as is reasonably practicable, risks from staff fatigue. This is the case even if there is no shift work, no significant overtime, and no safety critical work. These basic fatigue controls may include, but are not limited to:

- A brief statement in the company's health and safety policy about controlling identified and documented risks to staff and others from staff fatigue.
- Basic arrangements for ensuring that staff do not work when fatigued, including:
    - Guidelines for managers and staff on expected maximum daily and weekly hours, and arrangements for checking that these are being followed.
    - Guidelines on what staff should do if they feel too tired to work safely.
    - Guidelines on what supervisors or managers should do if they believe a member of staff is too tired to work safely e.g. hold fatigue conversations with their staff, assign them to other duties etc.
    - Guidelines on fatigue aspects of work-related driving (road risk). For many organisations this may be the most serious potential fatigue risk for their staff. See Appendix A for more advice, and the HSE's web pages on 'Driving and riding safely for work'.
    - Guidelines for supervisors and managers on making simple enquiries of employee fatigue and general well-being, as part of their day-to-day management role – talking with staff.
    - The inclusion of fatigue in the company's general safety and well-being training (e.g. during staff induction and periodically thereafter).
    - Ensuring that incident and accident investigation procedures consider whether fatigue may have contributed.

4.2 Dutyholders should decide whether the above steps are sufficient to ensure that any fatigue risks in relation to their operations are identified and acted upon before they cause problems or whether additional controls are necessary to ensure they meet their duties to reduce risks from staff fatigue, so far as is reasonably practicable. More information on reasonable practicability can be found on ORR's Risk Management web page.

4.3 If staff in an organisation carry out shift work or significant overtime or safety critical work, fatigue risks are likely to be higher if uncontrolled, and a more comprehensive FRMS as described in sections 5 to 9 will be appropriate.

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