# 15. Appendix F: A Fatigue Risk Management System Checklist

Some features of a Fatigue Risk Management System (FRMS) are summarised in the table below which may be useful as a checklist when organisations are considering the adequacy of their fatigue management arrangements.

The FRMS should be proportionate to the size and complexity of the operation and the likely risks from fatigue – it is recognised that not all items in the checklist will be appropriate for all organisations.

| **No.** | | **Paragraphs in this guidance** | | **Issue** | **Company FRMS / SMS ref?** | **Comment** |
| --- | --- | --- | --- | --- | --- | --- |
|  | | Plan | | | | |
|  | | Determining your policy | | | | |
| 1 | | 6.2-6.3 | | Is there a fatigue policy? |  |  |
|  | |  | | Does the fatigue policy: |  |  |
| 2 | | 6.5 | | - recognise the risks of fatigue? |  |  |
| 3 | | 6.6-6.7 | | - recognise the need for a ‘just’ culture? |  |  |
| 4 | | 6.8-6.9 | | - recognise the need for senior management commitment and leadership? |  |  |
| 5 | | 6.10 – 6.12 | | - commit ongoing adequate resources? |  |  |
| 6 | | 6.13 – 6.15 | | - involve staff, e.g. via groups or fatigue champions? |  |  |
| 7 | | 6.16 – 6.18 | | - set out the expectations on individuals? |  |  |
| 8 | | 6.19 | | - recognise the links between staff resources, workload, fatigue and stress? |  |  |
| 9 | | 6.20 | | - set out how data will be collected and used? |  |  |
| 10 | | 6.21 | | - describe how the adequacy of fatigue controls will be reviewed? |  |  |
|  | | Planning for Implementation | | | | |
| 11 | | 6.23 | | Is information gathered on current fatigue controls? |  |  |
| 12 | | 6.24 | | Are suitable benchmarks for risk control identified? |  |  |
| 13 | | 6.25 | | Is there a plan for achieving the benchmarks? |  |  |
| 14 | | 5.1 – 5.3 | | Is there an FRMS? |  |  |
| 15 | | 5.4-5.5 | | Is the FRMS integrated within the wider SMS? |  |  |
| 16 | | 5.6 | | Is the FRMS proportionate to the organisation and its fatigue risk? |  |  |
|  | |  | | Does the FRMS include processes for: |  |  |
| 17 | | 6.28-6.31 | | - fatigue risk assessment? |  |  |
| 18 | | 6.32-6.34 | | - designing working patterns which minimise fatigue risk? |  |  |
| 19 | | 6.35-6.36 | | - communication, co-operation and consultation with staff? |  |  |
| 20 | | 6.37-6.39 | | - training, instructing and providing information to staff? |  |  |
| 21 | | 6.40 | | - management and supervisory control of fatigue risks? |  |  |
| 22 | | 6.41 | | - measuring performance and reviewing the effectiveness of the FRMS, e.g. via KPIs? |  |  |
|  | | Do | | | | |
|  | | Profiling your organisation’s health and safety risk | | | | |
| 23 | | 7.3-7.8 | | Are the staff at risk of fatigue identified? E.g. those working shifts, overtime, carrying out safety critical work, contractors, those with second jobs, etc. |  |  |
| 24 | | 7.9-7.18 | | Are the risks faced by staff and the organisation identified? E.g. via the triangulation approach |  |  |
|  | | Organising for health and safety | | | | |
| 25 | | 7.19 | | Is there a joint management / staff fatigue group? |  |  |
| 26 | | 7.19 | | If so, has the remit for that group been clearly defined? |  |  |
|  | | Implementing your plan | | | | |
| 27 | | 7.21 | | Are standards set for working hours and patterns? |  |  |
| 28 | | 7.22 | | Do those standards take into account recognised national industry good practice? |  |  |
| 29 | | 7.25 | | Do those standards and limits, so far as reasonably practicable, take into account foreseeable causes of fatigue? |  |  |
|  | | Designing your work patterns | | | | |
|  | |  | When designing work patterns are the following considered, so far as reasonably practicable: |  |  |
| 30 | | 7.28-7.37 | - length of periods of duty? |  |  |
| 31 | | 7.38-7.44 | - intervals between duties? |  |  |
| 32 | | 7.45-7.65 | - recovery time? |  |  |
| 33 | | 7.66-7.75 | - shift work and shift patterns? |  |  |
| 34 | | 7.76-7.80 | - time of day? |  |  |
| 35 | | 7.81-7.91 | - rest breaks? |  |  |
|  | | Implementing your work patterns | | | |
| 36 | | 7.94-7.96 | Are there processes or technologies in place to detect fatigue? |  |  |
| 37 | | 7.98-7.101 | Are staff trained and are refresher briefings provided? |  |  |
| 38 | | 7.102-7.108 | Is there supervision in place to manage staff working hours? E.g. overtime, shift exchange, travel time and on call duties |  |  |
| 39 | | 7.109-7.110 | Are there arrangements in place to ensure fitness of workers via medical assessment and fitness for duty checks? |  |  |
|  | | Check | | | |
|  | | Measuring performance | | | |
| 40 | | 8.3-8.6 | Are deviations from good fatigue management practices monitored? |  |  |
| 41 | | 8.7-8.8 | Are fatigue assessment tools used to assess rosters and/or samples of actual hours worked? |  |  |
| 42 | | 8.9-8.11 | Is feedback obtained from staff? E.g. by asking staff, using fatigue reporting systems and fatigue surveys, etc. |  |  |
| 43 | | 8.12-8.19 | Is data evaluated from company records? E.g. monitoring trends in shift exchange, overtime, sickness absence records, travel time, other data sources, KPIs |  |  |
|  | | Investigating accidents and incidents | | | |
| 44 | | 8.20 | Is fatigue considered as a possible contributory factor when investigating accidents, incidents and near misses? |  |  |
|  | | Act | | | |
|  | | Reviewing performance | | | |
| 45 | | 9.2-9.4 | Are reviews of performance undertaken? i.e. when there has been significant change in circumstances, working patterns or standards, when fatigue contributes to an incident or when monitoring suggest controls need to be improved or there is other reason to doubt the effectiveness of the arrangements? |  |  |
| 46 | | 9.5 | Is there a system for periodic independent review? |  |  |
|  | | Learning lessons |  |  |  |
| 47 | | 9.6 | Are results of reviews fed back into the FRMS? |  |  |
| 48 | | 9.7 | Are improvements made to the FRMS fed back to staff? |  |  |