Quality, Health, Safety and Environment

14 12 FIP 40 60

Fatigue Improvement Programme

Frequently Asked Questions

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Version control:	Version 1.0	First Issue	Date: 7th September 2018
			Date:
			Date:

home safe plan

everyone home safe every day

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1. Overall objectives

1.1. Background

- The purpose of the Fatigue Improvement Programme is to reduce the risk of fatigue related incidents and ill health within Network Rail and its supply chain to as low as reasonably practicable (ALARP). This process also demonstrates the means by which Network Rail complies with UK Health and Safety legislation.

- In addition to the development of the standard and the delivery of the enablers for the programme, education on fatigue plays a crucial role. Education on the programme is taking many forms and one of these is the capture and publication of frequently asked questions.

- This document is the means of recording these questions and the answers provided. It is intended that this is a living document. Answers given will be reviewed every 3 periods to ensure they are still relevant. This document will be published on Safety Central every quarter.

- The questions are divided into 4 sections, these being:
    a. Context – Why are we doing the programme?
    b. Programme – What are we doing across all of the programme work streams?
    c. Standard – What is in the standard?
    d. Personal – How does the programme affect me?

2. Context

2.1. The Science: Sleep / Fatigue / Rest

2.1.1. What is Fatigue?

Fatigue is also known as tiredness, reduced energy, physical or mental exhaustion, or lack of motivation. The RMT define fatigue as "the decline in mental and/or physical performance that results from prolonged exertion, lack of quality sleep or disruption of the internal body clock. The degree to which a worker is prone to fatigue is also related to workload. For example, work that requires constant attention, is machine paced, complex or monotonous can increase the risk of fatigue"

2.1.2. How do you know I need 8 hours sleep, I only have 5 per night and I don't feel fatigued?

People who can get by on four hours of sleep sometimes brag about their strength and endurance. But recent scientific studies show that a lack of sleep causes many significant changes in the body and increases your risk for serious health concerns such as obesity, disease, and even early death.
Sleep is an important function for many reasons. When you sleep, your brain signals your body to release hormones and compounds that help:

- *decrease risk for health conditions*
- *manage your hunger levels*
- *maintain your immune system*
- *retain memory*

2.1.3. What is the definition of "Rest"? I have a young family and therefore I come to work to have a rest!

Rest is defined in the standard as "Period of time spent not commuting, working at the employers request including training courses etc., nor on standby or on-call." Having a young family may well interrupt a person's ability to gain quality rest and therefore a discussion with your line manager would be useful.

2.2. The research / previous accidents

2.2.1. NR employees haven't really had a history of accidents due to fatigue. What is driving the need to change current arrangements and potentially penalise employees?

Unfortunately, this is not the case. Since 1988, there have been 14 British Rail/Railtrack/Network Rail incidences relating to fatigue, resulting in a total of 52 fatalities and 612 persons injured. In addition to the above there have been a number of Recommendations relating to the improvement of Network Rails management of fatigue.

2.3. Who is impacted by the changes?

2.3.1. Does the new standard only affect safety critical staff?

No, the new revised standard now covers all Network Rail employees and all people working on Network Rail infrastructure.

2.3.2. Does this new standard cover our contracting community?

Yes, if working for/on behalf of Network Rail. However, it should be noted that a lot of our contractors already have robust fatigue management policies in place or are working towards them.

2.3.3. Managers are already going around and assessing who is greater than 14 hours away, people are jumping the gun.

We are reminding managers that the current standard stays in place until the revised standard is published in its entirety in December 2019, after which the date for compliance with the revised standard is October 2022.

2.4. Responsibility for fatigue

2.4.1. The company should not be asking individuals to take responsibility for their own fatigue? Why is this an individual's problem?

Section 7 of the Health and Safety at Work, etc Act 1974, requires employees to take care of the health and safety of themselves and others; and to cooperate with the employer where health and safety initiatives are implemented to protect the employees.

With this in mind it's a requirement that employees attend work in a fit state to undertake their duties, this includes being in an alert state that reduces the likelihood of incidents/accidents occurring.

2.4.2. If your work planning was more effective the issue of fatigue would be minimised.

The programme wholeheartedly agrees with this view and supports the principle that effective planning improves the opportunity for alertness.

2.4.3. When do you think it will be safe to say I am fatigued, I cannot come to work?

This is cultural education and it will take significant time. We are currently planning the educational journey and plan to start this in January 2019.The programme is centred around introducing a hierarchy of fatigue risk control that will enable improved management of the risk and mitigation activities to limit fatigue. With that in mind the control of "not coming into work" may still be an option, but it will be low in the hierarchy of controls that could be applied.

2.5. How to manage Fatigue?

2.5.1. How will my Fatigue be managed?

This is one of the challenges that the programme is working on. The programme is still in early development and this will become clearer nearer the time of standard publication.

2.5.2. What does a good Fatigue Management Plan look like?

As part of the supporting documentation to accompany the standard we will be providing a "What good looks like" guide. This will have examples of a good Fatigue Management plan as well as the kind of questions and potential mitigations that should be considered.

2.5.3. I am expected to lodge away from home which causes fatigue as I am not able to sleep during the day what will the company do about this?

This needs to be raised with your line manager and there needs to be a conversation about what suitable alternatives to how the fatigue risk can be managed, including potential change in lodgings where required.

2.5.4. How will the programme ensure that fatigue is measured / monitored on last minute shift changes?

This question will be able to be answered as the programme develops.

3. Programme

3.1. The Programme – What is being introduced?

3.1.1. What trigger points is the business introducing?

- *An aspiration that by the end of CP6 the business will be in a position to have a <12 Hours limit*
- *Door to door limits created at 2 levels, Level 1 >12 Hours but <14 Hours = group or community Fatigue Management Plan and Level 2 >14 Hours = Personal / Individual level Fatigue Management Plan*
- *Maximum 60-hour week*
- *Minimum 12-hour rest period between shifts (including travel time)*
- *FRI limits based on day or night shift patterns and safety critical nature of role.*

3.1.2. I have heard the business is introducing new rules around hours worked. Why is this?

The reasons for the introduction of the Fatigue Improvement Programme are 4 fold. These being:

- *It's the right thing to do and reinforces the duty of care for our employees.*
- *One accident due to fatigue is one too many. We wish to reduce the occurrence of accidents.*
- *Fatigue has been identified to potentially having a similar effect on alertness to alcohol. We have a D&A policy for good reason, this is the next step.*
- *To comply with legislation.*

3.1.3. What are the changes being introduced with regards to Fatigue Management?

The key elements being introduced are:

- *Strengthening of our management of Fatigue Risk by having clearly defined trigger points for when a Fatigue Risk Management Plan has to be completed.*
- *Fatigue Education. How to recognise it, the causes, the effects and how it may be combated.*
- *Activities to enable the embedment of the Fatigue principles.*

3.1.4. Why have the limits been chosen? Why 12 and 14 hrs? What drives the FRI of 40?

Scientific research, RSSB, HSE guidance, have contributed to the trigger points of 12 and 14. The optimal time for the body to carry out its repair activities is 8 hours. Research also suggests a preparation time and wake up time of an hour before and after sleep. This gives 10 hours of time at place of rest. You can therefore see that 14 hours are left and the aspiration of 12 hours allows for travel time.

3.1.5. Does the 12-hour rest period include driving?

We are not mandating minimum of 12hrs rest, but 12hrs between shifts offering the best opportunity for quality rest. Rest is defined in the standard as "Period of time spent not commuting, working at the employers' request including training courses etc., nor on standby or on-call."

3.1.6. What work has been carried out to understand the impact on the business?

Change Impact Assessments (CIA) are being carried out to understand the impact. This is coupled with the vacancy gap analysis work. CIAs are a very important element of the programme and will be used to shape the final standard and its modules.

3.1.7. Trade Unions have never agreed to the Fatigue Risk Index score being used to determine whether a roster is acceptable or not? Why is this part of your plans?

The Fatigue Risk Index score exists as part of the existing standard. It is the HSE recognised means of assessing fatigue risk. There has also never been a standardised means of benchmarking fatigue risk within the railway industry. This revision to the standard will begin the process for creating a better understanding of measuring fatigue risk and also some of the limitations associated with it as well.

3.1.8. How are you going to educate line managers on Fatigue?

We don't have all the answers at this stage and need to consider how best to educate everyone affected by fatigue risk. As the programme develops we will be exploring and determining how best to do this and would hope to explore joint training with you on this subject.

3.1.9. The timescales are lengthy so there will be uncertainty in the interim, you need to manage a consistent message to prevent against abuse and misunderstanding.

We completely agree. The way we are managing this is through the provision of centrally provided communications, which include posters, promotional materials, briefing packs (including notes) and safety hour materials. All communications are agreed with via a Communications Working Group which includes members from the business. Business Engagement Leads, responsible for the cascade of communications into their respective business areas, are also regularly updated with key messaging.

3.1.10. How do we ensure a clear message to the business whilst the standard is being developed?

Communications form an important part of the programme and will be managed closely to enable clear and consistent messaging.

3.1.11. How will we make sure there are rest breaks for everyone?

Whilst this is outside of the scope of the programme, we will be providing guidance and education so that breaks are considered as fatigue mitigation. These will be part of what a good fatigue management plans looks like.

3.1.12. On-call is the last module, for maintenance this is the most important why is it at the end?

Working time and on call is intended to be the last module published as we expect it to be the most complex. Work is starting on it in the near future; work will be ongoing with all modules during the timeframe June 2018 - December 2019.

3.1.13. We would like all those rostering and representatives trained in the FRI tool is this going to happen?

This is something we intend to fully explore within the programme.

3.1.14. FRI works for base roster but doesn't include overtime nor driving to work (which isn't specified in our terms and conditions). Will overtime and driving time be considered? Ultimate would be to have real time FRI

This is something we intend to fully explore within the programme. It should be noted that the FRI calculation does include commute times.

3.1.15. There are huge costs attached to this you are going to have to recruit more staff. We are concerned establishment will be the last thing to be considered?

We are exploring the vacancy gap and staffing requirements as part of this programme.

3.1.16. You will need to run organisational sizing models again.

We will need to explore staffing requirements as part of this programme.

3.1.17. What will happen with out of hour rostering - will out of hours rosterers, for example MOMs, be trained?

We will need to explore this and develop solutions for those carrying out "out of hours" rostering.

3.1.18. Is this an industry wide initiative or just NR?

The Fatigue Improvement Programme is a Network Rail initiative and programme. However, the industry is taking Fatigue and the management of fatigue risk very seriously. The programme team is working closely with outside bodies such as the supply chain, Train/Freight Operating Companies and the RSSB as a few examples.

3.1.19. The logo doesn't make sense. The slide explaining what the numbers does – is it worth rethinking the logo?

We take on board your comments and have reviewed the logo. The key attributes of a good logo are:

- *Simple – So as to be recognisable*
- *Scaleable – Able to be scaled up or down in size and still readable*
- *Memorable / Impactful – To generate initial interest*
- *Versatile – Look good on any media (office documents, social media, promotional)*
- *Relevant – Has to have meaning*

We believe that the Fatigue logo does indeed cover all of these points.

3.1.20. How will you stop the use of breaks being abused so managers can add extra shifts in?

This will be part of the guidance around roster design and will form part of the consideration for assurance and compliance. It's worth noting that Health and Safety Representatives will also have a greater oversight of the roster design process.

3.1.21. You say fatigue has a similar impairment to alcohol and drugs, don't necessarily agree. How do you measure fatigue impact? How will you measure if someone is fatigued?

We are currently developing how this can be measured and are looking at a wide variety of good practice on how this is delivered in other organisations. As the programme develops with this we will start to share our progress.

3.1.22. I am not sure this is the same impact as alcohol, as unsure as to how you measure this and get to fact rather than opinion, where is the science in this?

We are currently developing how this can be measured and are looking at a wide variety of good practice on how this is delivered in other organisations. As the programme develops with this we will start to share our progress.

3.2. External impacts

3.2.1. What is going to be the impact on our 3rd party contracts already in place? This is going to push up costs. Has the business considered this?

This question will be able to be answered as the programme develops.

3.3. What fatigue data will be used?

3.3.1. I understand information will be pulled out of Click Roster. We don't use Click Roster so how will our information be gathered?

Click Roster will be used where applicable. We are aware that large parts of the business do not utilise shift working. In these circumstances Line Managers will need a means of determining a method of understanding an individual's upcoming time requirements. Without this the need for a Fatigue Management plan cannot be determined.

3.3.2. How will managers' workload and hours be looked at?

This is to be explored as part of the change impact assessments.

3.4. Recruitment

3.4.1. This all comes down to resource. You don't have enough people in front line roles which is why so much overtime is being worked. Are you recruiting? If so what are your plans.

We are currently carrying out vacancy gap analysis. In the maintenance space we are working towards a 0% vacancy gap. If it transpires that even with a 0% vacancy gap, we won't have enough people then we will need to consider the need for additional staff.

3.4.2. How are we meant to roster shifts in line with the standard when we do not have enough staff?

As part of the programme a gap analysis is being carried out to determine the levels of staffing that the business needs to implement the Fatigue standard.

3.4.3. Where are we going to find all the extra recruits? They simply are not out there in the market.

As part of the gap analysis work being carried out and subsequent recommendations, the market place resilience will be taken into account. Both recruitment and training frameworks will also be considered.

3.4.4. An FRI of 40 will destroy Phase 2bc. What is the business doing about this as it will need a huge amount of extra staff?

This question will be able to be answered as the programme develops. At this stage we do not see the need to change any of our existing rostering agreements. An element of the programme is looking at the

vacancy gaps that will hinder the adoption of the programme. Also, the key elements being introduced by the programme are:

- *Strengthening of our management of Fatigue Risk by having trigger points for when a Fatigue Risk Management Plan has to be completed.*
- *Fatigue Education. How to recognise it, the causes, the effects and how it may be combated.*
- *Enabling activities to allow the embedment of the Fatigue principles.*

3.5. Trade Union Engagement

3.5.1. What do the Unions think of this?

We are at an early stage in the programme but are involving our Trade Union colleagues at every step. We are developing an engagement framework that focuses on collaboration. All views, not just our Trade Union colleagues, will be considered.

3.5.2. How will you involve trade unions in the FRI process?

We have put an engagement proposal to the unions for how we collaboratively work together on all modules of the standard. This is currently being assessed.

3.6. Diversity and Inclusion – Everyone Home Safe Everyday

3.6.1. How does the programme cater for individuals who require what is considered as normal time to get to work (convoluted commute due to disability)?

We are at an early stage in the programme, but we are already working very closely with all our D&I networks to ensure everyone's fatigue is managed in an appropriate manner.

3.6.2. How would an individual's home circumstances be considered for working out FRI?

This question will be able to be answered as the programme develops.

3.6.3. How are long term caring responsibilities (e.g. carer for dependant) reflected in the FRI?

We are working closely with all our D&I Networks. This question will be able to be answered as the programme develops.

3.6.4. What happens if my situation that is causing me fatigue is not "typical", such as fatigue due to transitioning?

All causes of fatigue are particular to the individual. We want Line Managers to provide a caring environment for the individual and an open forum for discussions. Should a Line Manager need further assistance then the usual channels are available via HR Direct and the D&I Networks.

3.6.5. How do we deal with colleagues who have specific requirements for example fasting Muslims during Ramadan, disabled employees, carers.

We will need to engage with the staff networks to make sure this is inclusive and covers everyone. We have just started this engagement

3.6.6. Does the FRI calculator take into account health conditions or stresses on the body during transitioning?

No, it does not. The FRI tool is a HSE tool and is, by its nature, very generic. It cannot possibly cater for every potential possibility. However, the outcome of the tool is only one element that a Line Manager and employee should consider when determining fatigue risk. All causes of fatigue are particular to the individual. We want Line Managers to provide a caring environment for the individual and an open forum for discussions. Should a Line Manager need further assistance then the usual channels are available via HR Direct and the D&I Networks.

3.6.7. Does the FRI calculator take into account age?

No, it does not. The FRI tool is a HSE tool and is, by its nature, very generic. It cannot possibly cater for every potential possibility. However, the outcome of the tool is only one element that a Line Manager and employee should consider when determining fatigue risk. All causes of fatigue are particular to the individual. We want Line Managers to provide a caring environment for the individual and an open forum for discussions.

3.6.8. Does the FRI calculator take into account mental health?

No it does not. The FRI tool is a HSE tool and is, by its nature, very generic. It cannot possibly cater for every potential possibility. However, the outcome of the tool is only one element that a Line Manager and employee should consider when determining fatigue risk. All causes of fatigue are particular to the individual. We want Line Managers to provide a caring environment for the individual and an open forum for discussions. Should a Line Manager need further assistance then the usual channels are available via HR Direct and the D&I Networks.

4. Standard

4.1. The standard

4.1.1. What is the scope of your on-call module?

The on-call module is not intending to define "limits" but trigger points for mitigating actions. This module will define on-call and what activities should be included when assessing working time. It will also incorporate the "Hidden" recommendations for working time and formally establishes them within the standard. This will be one of the more challenging modules, and will be developed over the next 18 months.

4.1.2. What are the expected outputs of all the 5 modules?

The outcomes of the programme are:

Outcome	What Success looks like
Accidents reduced, *Compliance increased,* *Work life balance improved,* *Fatigue reduced,*	*LTIFR reduced and self-assurance returns show an improvement.* *Over time the numbers of Fatigue Management Plans decrease and instances of sickness absence decrease and surveys indicate increase in work life balance.*
Understanding that standard is NOT mandating Maximum Working Hours	*Question is not raised at any brief or during stakeholder consultation sessions.*
Supports the safety of employees and customers	*Fatigue related accidents reduced*
Recognition that responsibility lies with both business and individuals	*Question relating to responsibilities are not raised at any brief or during stakeholder consultation sessions.*
Resilience to fatigue increases	*Instances of sickness absence due to fatigue decrease and surveys indicate increase in work life balance.*
An acceptance that it is "OK" to declare fatigue	*Reduction in FRA over time (following initial increase).* *Fatigue Management Plans published.*
Employee work life balance increases	*Surveys indicate increase in work life balance.*
Beneficial effect on mental health of employees	*Instances of sickness absence relating to mental health decrease.*
Behaviours around fatigue and fatigue leadership improve	*FRM Dashboard KPIs developed and measured. These to be used in planning.*
Improves moral of employees	*Reduced turnover of staff.* *Reduced illness / Mental Health issues.*
Fatigue is considered both in planning and investigations	*FRI included in investigations.* *FRMPs examined as part of investigations.*

4.1.3. The current standard is not being followed out there in the business, why will the revised standard be any different?

This is a great opportunity to "protect people from themselves" and to make sure we have got a standard in place which works. We are striving hard to ensure that the new standard is one that the business can adopt and use. A significant element of the programme is the development of Change Impact Assessments. (CIAs). These will help to identify which elements of the current standard are not being followed and what the change impact will be.

4.1.4. FRI is not the complete answer it is part of a solution, please remember this.

We agree, and we consider FRI to be part of the solution, combined with the other requirements of the standard (trigger points). Other mitigations to fatigue will also need to be explored, discussed and developed, and the programme will be doing this.

4.1.5. Managers are using the draft standard now, should they?

Current Fatigue Management Standards remain in place until the new standard is fully published in December 2019.

4.1.6. What time does a day shift start and end, and what time is a night time worker considered as?

This is defined in individual Terms and Conditions.

4.1.7. We are expected / told to put 35 hours in our timesheets which does not accurately reflect how much time we really work; how does the programme ensure we record our actual hours worked?

As stated within the standard, actual hours should always be booked / recorded across the business.

4.1.8. How will fatigue be managed for non-safety critical members of staff?

The approach to fatigue management for both safety critical and non-safety critical staff is the same and will be defined within the revised standard.

4.1.9. How are short term caring responsibilities reflected in FRI? e.g. new baby

This question will be able to be answered as the programme develops.

4.1.10. Is sending emails / reading emails late at night after work considered in working time?

This question will be able to be answered as the programme develops.

4.1.11. Some areas of the business do not use the FRI calculator, how will they assess fatigue?

The tool that enables the FRI assessment, and is recognised by Network Rail, has been developed and recommended by the Health and Safety Executive (HSE) and can be located via their website: www.hse.gov.uk/research/rrpdf/rr446cal.xls

4.1.12. FRI doesn't mention risk score just fatigue and it should be both.

We are currently looking into how best to incorporate the risk score, particularly in the production of fatigue risk management plans. This will be dependent upon business maturity and the understanding of how to incorporate the scoring mechanism into fatigue risk controls.

4.1.13. You will need an escalation process if managers are using fatigue punitively, for example refusing overtime.

Agreed and This will be part of the Behavioural and Cultural change element of the programme.

4.1.14. You will need to include IR in the roster design module.

We will produce a RACI for each module. It's worth noting that IR already have established processes in place for roster design, this standard is focussed on the management of fatigue risk and will sit alongside existing IR requirements.

4.1.15. FRI calculator. Are you using the one which is one the government website as this can be manipulated?

Yes we are using the calculator from the HSE website and will provide guidance on it's use and application. The standard also requires a greater degree of health and safety representative oversight including review of the FRI information.

4.1.16. There is a contradiction that you say you aren't going to cut across terms and conditions but you have a module entitled working time limits suggests you are changing how people can work?

On reflection we recognise that the title of this module may be ambiguous. We have therefore changed the wording to be "Working time". It is not anticipated at this point that there will be a need to change any of our existing rostering agreements as a result of the Fatigue Programme. Should this position change we will engage fully and appropriately with our TU's in doing so.

4.1.17. The 12 hours between shifts, is it purely between work times not travel to work times?
Yes, it is the time between clock off and on times.

4.1.18. You talk about 12 hours between shifts, but 9 hours is allowable in an emergency.
The standard work stream is aware and will be exploring this reduced time.

4.1.19. The 40 Fatigue Risk Index Score. The highest risk is first and last nights of night shifts and how do you best manage this rest, there are lots of variables.
Yes, they are, we agree. Currently we have a FRI guide of 45 and want to take steps to reduce this. The Fatigue score is your percentage change of falling asleep on the way home from work.

4.1.20. There is a figure which is missing, should be a limit on the number of consecutive days you work, for example. Sundays are also outside the working week so how do you plan and manage this.
We appreciate this needs to be managed in a controlled way and will be part of the programme as it develops. It should be noted that the current standard states no more than 13 consecutive shifts.

4.1.21. On the FRI there are a fatigue figure and a risk number you only have the fatigue figure on this.
We want to build the risk figure but with a narrative behind it so it makes more sense to employees. We would like to develop a risk figure as a multiplier to be used to as part of the FRI assessment tool. Research is on ongoing at present

4.1.22. On call. We are seeing a big step up in the way in which we use on call, on call seems to be an immediate issue and there seems to be an increase in on call demands across NR.
'On call' and how it is defined and managed is one of the biggest challenges to the standard work stream. We recognised this at an early stage and, as a result, put this in the last module for publication (Dec 2019). We will be undertaking a significant amount of work focussing on this and as it develops we will approach the business for feedback on progress.

4.1.23. We seem to have glossed over 60 hours, is that a limit?
NR made a commitment to the ORR to look to get to 60 hours and get to an average. For clarity the 60 hours is a trigger point. If this trigger is met than an individual Fatigue Management plan will have to be developed and implemented.

4.1.24. What is meant by the term "Working on Network Rail Infrastructure"? Our contractors are working on creating and amending Network Rail software systems, but they will never set foot physically on Network Rail infrastructure. Do they need to comply with the standard?
Yes. The new standard NR/L2/OHS/003, Fatigue Risk Management, Section 2, Scope, states:

This manual specifies the principles for managing fatigue and working hours. It applies to:

- *all Network Rail employees regardless of their role; and*
- *those contractors whose employees work on Network Rail managed infrastructure, assets and systems.*

The inclusion of "Assets and Systems" would indeed mean the contractors in your example would need to be compliant with the standard for the duration that they are working on a Network Rail system.

4.2. How will my fatigue be measured?

4.2.1. What kind of measures can a line manager introduce to manage someone's fatigue issue?
Measures will largely depend upon the individuals' particular causes of fatigue and specific circumstances. However generic things that could be considered, in no particular order, would be,

- *Provide a caring environment for the individual and open forum for discussions around fatigue risk and possible mitigations*
- *Flexible working*
- *Reasonable adjustments, where they apply*
- *Sharing of some work activities with other members of the team*
- *Overnight accommodation close to the site of works*

- *Appropriate and targeted breaks in a peaceful and quiet environment*
- *Reappraisal of deadlines to smooth out work pressures*
- *Agreeing a set of rules within the team such as no emails from 7pm to 7am*
- *A discussion with the individual to investigate if there are any actions they can take in their personal life to ease a situation*
- *Investigate if there is a technology solution that could assist*
- *Consider the mode of transport or if a car sharing group could be established*
- *Provide Fatigue education and point the individual to the fatigue section on Safety Central.*

4.2.2. How will fatigue of the workforce be measured? Will we be required to wear monitors when at home?

No. The way we measure fatigue is still being developed and will be advised as we progress with the programme. We may consider a trial of sleep monitors to assess levels of quality rest in differing scenarios, but any trial would be limited and on a strictly volunteer basis.

4.2.3. You could capture peoples working time through Sentinel if you got everyone to have it. Is this part of the plan?

There are a number of ways that time is or can be captured. All are being considered on their own merits and will form part of the development of the programme.

4.2.4. How do managers log their hours?

If hours are not recorded a time booking system of some description may need to be utilised. However, for Fatigue Management a means of understanding projected hours is also beneficial to allow for Fatigue Management Plans to be pro-active and not re-active.

4.2.5. Will the programme team monitor Fatigue data across all the routes, how will fatigue measures be followed up?

It is not just Routes that will require monitoring of fatigue data. All areas of the business will need this. We are currently working with the Business Engagement Leads on their implementation plans and as part of this we will be considering reporting dashboards. There will be more on this as it develops.

5. Personal

5.1. What does this mean for me?

5.1.1. I live 3 hours from my place of work. Does this mean I will have to relocate?

The impact of your travel to and from your place of work will be considered as part of an individual or group risk assessment depending upon your total hour's home to work and appropriate mitigations explored with you.

5.1.2. What will happen if I exceed the maximum shift length?

The revised standard has not defined a maximum shift length. There is, however, trigger points that, if exceeded, will necessitate either the group or individual having a Fatigue conversation with their manager and a Fatigue Management Plan being agreed and enacted.

5.1.3. What happens if the need to work longer occurs in a shift?

We are aware that this situation does sometimes occur. In this situation the Fatigue implications on the individual will have to be discussed and the Fatigue Management plan either written or amended if one is already in place.

5.1.4. I don't fill in a timesheet at the moment. Does this mean I will need to do so in the future?

There needs to be a way for the business to capture an individual's time. Without this the need for a Fatigue Management plan cannot be determined.

5.1.5. Why are the hours door to door? Are you limiting where I can live in relation to the work place?

There is a lot of scientific research behind the guidelines issued by RSSB, HSE and others. This research has been considered when developing the principles. For the body to carry out the numerous activities it does when we are asleep it needs to have, not only a suitable "Sleep time" (8 hours' is the recommended duration) but also at least an hour preparation time and an hours' wake up time. Research also shows that travelling to your place of work, however this is carried out, does not give the required rest that the body and mind needs.

5.1.6. I regularly work more than a 60hr week and am not fatigued. Why will my hours and hence money be curbed? Will I be compensated?

The intention of the standard is not to curb working hours but a working week in excess of 60 hours, or more than 12 hrs door to door will trigger the requirement for a FMP. It should be noted that scientific research has shown that most people who are suffering from Fatigue may not recognise it as the effects have become their norm. It is only when they manage sufficient rest and sleep do they realise how much better they feel.

5.1.7. I regularly get tired. Can I use this as a reason not to turn up for work?

A significant element of the programme is around education. This will include how early awareness of the causes of fatigue can be determined. If an individual is, or believes they will, suffer fatigue then they should raise this with their line manager and a Fatigue Management Plan agreed and implemented.

5.1.8. I get the train to work so can rest then. Is this considered as rest?

No. Rest is defined in the standard as "Period of time spent not commuting, working at the employers' request including training courses etc., nor on-standby or on-call."

However, in discussions around the FMP development, the mode of transport should be considered because the risk will vary depending on what that mode of transport is.

5.1.9. PTR&R allows us to travel up to 75 minutes each way, with a 12-hour shift this is 14.5 hours door to door. Are you planning to renegotiate PTR&R.

No. The 12 and 14 hours are not limits but trigger points for the agreement and implementation of a Fatigue Management Plan. A line manager will take travel time into account when determining the need for a Fatigue Management Plan.

5.1.10. Does this mean the end to 12-hour shifts?

No. 12 hour shifts can be worked but, when travel time is taken into account, may necessitate the need for a Fatigue Management Plan.

5.1.11. What happens if I need to travel to a different location for the day of work which is further away than my normal location? Will my door to door increase?

Yes. Door to Door is defined as "A period of time identified as the combined total of travel time from a place of rest (e.g. home or lodgings), work time and return to a place of rest".

5.1.12. If I work in an office-based role, have had a busy day and decide to work late till 8pm to finish off some work. Am I not allowed to return until after 8am the next day?

Yes, that is correct. You must allow 12 hours between your shifts.

5.1.13. If I travel a lot with my role, and have decided to travel after a day in the office / working, does this impact my start time the next day?

Yes, you should allow 12 hours between your shifts and your travel time to another location is classed as working time.

5.1.14. We should be able to say you cannot work as you are too tired.

Agreed. A key outcome of the programme is the creation of Network Rail being a safe place to declare being fatigued and asking for help. Ideally this should be raised before fatigue becomes an issue. This can be done by the individual or the line manager taking into account upcoming workload and/or personal circumstances (i.e. New born baby). Not coming to work, however, should be a "last resort" option.

5.1.15. In maintenance we are supposed to have rest breaks, but we just don't take them

This will need to be explored rest breaks can be a key prevention of fatigue

5.1.16. Breaks are not always in operational terms and conditions and contracts.

This will need to be explored rest breaks can be a key prevention of fatigue

5.1.17. We are concerned about the 14-hour door to door standards, it doesn't take into account how people get to work, and i.e. whether you drive or take public transport.it is more fatiguing to drive than catch the train.

We agree. Lots of factor needs to be taken into account when managing fatigue, including mode of transport used to get to work. Key is the discussion between an individual and their line manager.

5.1.18. How are you proposing to capture working hours for people who don't fill in time sheets? Doesn't capture management or those in role clarity bands 5-8.

This will need to be developed as part of the programme.

5.1.19. The Fatigue management plan is it something which needs to be imposed by the manager?

Has to follow a protocol, but the intention is not to develop a plan which a manager imposes, it has to be something which is mutually created, and employees should have the right to challenge any outcome. We will consider this as part of the process when developing approach to individual and group fatigue management plans.

5.2. Me and my role

5.2.1. What happens if there is a safety issue on site and people need to stay on site longer than the limits to resolve it?

In this situation the fatigue implications on the individual will have to be discussed and the Fatigue Management Plan either written or, amended if one is already in place.

5.2.2. During Strike Cover what happens to those providing cover?

The trigger points will still apply and therefore a Fatigue Management Plan may be required It's probably worth noting that the introduction of a fatigue management plan will provide a means to record potential risks and controls when this type of work is undertaken, not something that's currently done.

5.2.3. There is no way the principles will align with available possession times. How is the programme making sure they do?

If available possession times result in not being able to apply a principle, then there will be a need for a Fatigue Management Plan. This should be a last resort however as Fatigue should be taken into account at the start of planning.

5.2.4. I work in Network Rail Consulting. Does this standard apply to me?

No. When working for Network Rail Consulting the Clients processes and procedures will have to be adhered to. However, individuals have a duty to themselves and others to consider their fatigue risk and to put mitigation activities in place.

5.2.5. Will I be stopped from working overtime?

Implications of working overtime will have to be assessed on an individual by individual basis. This assessment may indicate the need for a Fatigue Management Plan.

5.2.6. Signallers rosters and allocation of overtime are determined by National Rostering Principles. Are you planning to renegotiate these?

NRP will need to be reviewed as part of the final standard.

5.2.7. What are you going to do about the additional hour in signaller's terms and conditions of employment? Is this going to be removed?

There will need to be an individual risk assessment if a trigger point is passed.

5.2.8. ECOs self-roster. What plans to you have to make ECO rosters compliant?

We are afraid we are unable to comment as this is not part of the Programme scope.

5.2.9. Front line managers are already stretched, how do you expect them to manage the proposal for individual and group risk assessments? Are you planning to recruit more managers?

The outcome of the vacancy gap analysis and change impact analysis will take into account business requirements and will include front line managers. If this outcome determines a need for more staff then this will be considered.

5.2.10. Managers will sign off any exceedances to keep the job running, how are you going to combat this and make sure we have the right number of people in place to do the job required?

A key element of the programme is the vacancy gap analysis and the Change Impact Assessments. These will determine staffing levels and appropriate actions. In addition, the programme is strengthening the assurance and compliance regime around Fatigue as well as creating a greater focus and education on the subject.

5.2.11. I work more than 48 hours per week and haven't opted out of working time. What will you do about this?

The Working Time Directive is not part of the Fatigue Improvement Programme.

5.2.12. What does this do for on call then?

This will need to be fully explored and determined during development of the standard.

5.2.13. You need to take in to account seasonal conditions, it is harder to sleep in summer when on nights that in the winter.

We note and agree with your comments on weather and sleep as a variable for sleep rest and impact. There is an excellent book out by Matthew Walker called why we sleep. Impact of seasonal patterns and shift sleep patterns will be a part of sleep research