



Fatigue Management

Procedure

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RECORD OF AMENDMENT

REVISION	SECTION	AMENDMENT
4	Intended user	Inclusion of medical personnel to support workforce health and wellbeing
	1.2	Updated requirement for offshore personnel commencing night shift following afternoon mobilisation, aimed at reducing the impact of travel-related fatigue and ensuring appropriate approval is obtained.
	1.2	Updated principles relating to fatigue management for non-rostered employees on extended trips to operating facilities.
	1.2	Inclusion of Fatigue risk assessments are now available in both electronic and paper-based formats. The electronic form is the preferred method, with any paper forms to be entered into the system by the supervisor or delegate.
	1.2	Inclusion of follow-up fatigue risk assessment if fatigue risk increases or existing controls are found to be ineffective. A new Fatigue Risk Assessment must be completed by the worker and supervisor to reassess and implement additional or alternative controls.
	1.3	Removal of periodical review and inclusion of fatigue-related metrics will be actively monitored and reported where fatigue is a contributing factor.
	3	Inclusion of Fatigue Risk Assessment printable form
	4	Removal of definitions such as 'jet-lag' as this term is not related within the procedure.

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About This Procedure

Purpose

This Procedure defines the requirements for managing fatigue at INPEX Australia (the Company) facilities and worksites and is in accordance with the [Fitness for Work Standard](#).

Scope

The scope of this Procedure applies to all personnel and entities entering any Company worksite or working for or on behalf of the Company at any other worksites, where the Company has legal obligation and/or the authority to introduce and implement Health, Safety, Environment and Quality (HSEQ) requirements.

Intended user

Intended users of this Fatigue Management Procedure are personnel who are:

- Personnel responsible for planning, managing, or performing tasks where fatigue presents an increased risk of an unintentional error occurring resulting in an incident.
- Supervisors and team leads, involved in workforce planning and operational decision-making. Site medical personnel involved in the support of personnel health and wellbeing.
- Medical personnel to support identifying and managing fatigue-related risks to ensure the overall health and wellbeing of the workforce.

1. Risk Management

1.1. Risk Assessment

Identification

- All activities that may result in fatigue shall be identified and risk assessed,
- The Risk Owner shall determine the context for the hazard and risk management approach to be undertaken,
- The approach adopted shall be commensurate with the nature, complexity and inherent risk associated with activities involved.

Risk Assessment

- Where Fatigue may presents as a hazard either well understood or where new or more complex activities are not so well understood, fatigue can be risk assessed according to the [HSE Hazard and Risk Management Procedure](#).
- Those undertaking the activity, must be engaged in the hazard and risk management process,
- Those responsible for conducting risk assessments shall ensure all hazards, including fatigue, are identified and suitable control measures are implemented.

1.2. Risk Control

Work Design and Planning

- All work including shifts, rosters, activities and travel shall be effectively planned and resourced in such a way that it reduces the risk of fatigue.
- In establishing rosters for personnel (other than those who work 5 days per week, Monday to Friday, standard business hours), the following shall apply:
 - Roster arrangements allow sufficient time for rest and recuperation,
 - Consideration is given to commute time from the individual's place of residence, point of engagement and work site,
 - A minimum 10 hour break shall be allowed between shifts,
 - Backward shifts are avoided where practicable and where personnel are working rotating shifts, these should, where practicable, be forward rotating (i.e. day to night),
 - Extended shifts up to 16 hours shall be permitted only if necessary to avoid an unplanned open safety critical position or accomplish an unplanned safety critical task, and,
 - Where personnel fly-in to an offshore facility on an afternoon flight for nightshift, the following controls shall apply:

- Where a workers night shift commences at 18:00; the total time from the worker's departure from their residence to the completion of the shift must not exceed 16 hours. A Fatigue Risk Assessment form must be completed with the worker's Team Lead prior to commencing the shift.
- The maximum time an individual shall spend working continuously at a Company operating asset and/ or remote location is four weeks (28 days), after which time the person shall have a minimum of one week's recreational leave before returning to any Company operating asset.



Note: Where non-rostered employees are undertaking extended trips (> 7 continuous days) to operating facilities:

- Leaders and employees must review the proposed itinerary and undertake a fatigue risk management review, which should include consideration of:
 - Whether the employee is working standard rostered hours.
 - Whether additional hours are being worked that may contribute to fatigue.
 - Where relevant, fatigue management principles shall be applied to mitigate identified risks.
- The line manager should reasonably manage fatigue and consult with HR and seek endorsement from the General Manager if time off in lieu is proposed.
- If an employee is scheduled to undertake more than two or more consecutive swings at an operating facility, consultation with HR is required to determine if they should be placed on an integrated roster.

Contractor
Management

- All future contracts and contract renewals, shall ensure that vendors, consultants and contractors are provided with adequate time for rest and recuperation,
- Contract personnel conducting work at INPEX facilities shall be subject to the same overtime and Overcycle restrictions as other personnel and should be provided with adequate (e.g.: reasonable and consistent ratio time off against time worked) time for rest and recuperation over consecutive rosters and months.

Overtime
Overcycle

and

- Records of time worked by these personnel shall be maintained by vendors, consultants and contractors and shall be subject to audit and review.
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- Overtime shall be limited as far as is practicable in accordance with the [Administration of Overcycle \(Operations\) Standard](#) and no-one is allowed to work an extended shift that exceeds 16 hours,
 - The following measures shall be taken prior to extension of shifts beyond 12 hours:
 - Shifts up to 14 hours:
 - Team Lead is to ensure person is fit to work and not affected by fatigue. This shall be done via observation, discussion and agreement shall occur between the individual and the Team Lead to proceed including provision of regular meal and rest breaks,
 - Where consecutive (>2 or more) extended shifts beyond 14 hours shall be avoided and must be endorsed by the Site Responsible Manager, after risk assessment has been undertaken.
 - Shifts up to 16 hours:
 - Team Lead is to assess fitness for work by completing the [Fatigue Risk Assessment Form](#) with the individual, and
 - This form must be signed by the individual, the Team Lead and the Site Responsible Manager and retained as an auditable record.
 - Only in exceptional circumstances (e.g. shutdowns) shall an individual work more than 28 consecutive days and/or over 7 days of Overcycle at any site. This shall only be permitted after a [Fatigue Risk Assessment](#) is completed to ensure fatigue risks are managed to ALARP and approval sought from the line manager two -levels up or from the General Manager for Offshore Installation Managers and Production Managers.

Fatigue Risk
Assessment Forms

- A fatigue risk assessment form shall be completed in the following scenarios:
 - Overcycle (>7 days or >28days)
 - Extension of Shift >14 hours
 - Self-reporting of fatigue
 - Observed fatigue
 - Follow up assessment
- In addition, where fatigue may be a contributing factor, the following scenarios require a Fatigue Risk Assessment to be completed:
- Post incident / Near-miss
 - Journey management
- An electronic and paper-based fatigue risk assessment shall be available for personnel to access and print, if required, from the Company intranet.

Training and Workforce Engagement

- The e-form shall be completed wherever possible over the paper based form and any paper based form completed shall be inputted into the system via the responsible supervisor or delegate.
 - The fatigue risk assessment form shall be conducted by an employee and their immediate supervisor, or suitable delegate.
 - A system generated reminder shall be triggered via email to the worker and the supervisor 24 hours following submission.
 - If controls are found to be ineffective or if fatigue risk has increased, the worker and supervisor shall complete a new Fatigue Risk Assessment to reassess the situation and apply additional, or alternative controls as indicated.
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- All personnel shall receive training on:
 - Recognising the signs and symptoms of fatigue in themselves and other personnel,
 - Personnel in supervisory roles shall receive additional training on:
 - Strategies for raising and addressing these issues with team members,
 - Identifying personnel who require referral to the EAP for conditions that may influence their FFW due to fatigue,
 - Identifying fatigue causal factors in incident investigations,
 - Managing potential fatiguing conditions such as overtime, schedule changes, rostering, etc., and
 - The implementation of control measures to reduce the risk to ALARP.
 - Supervisors shall discuss fatigue risks with their work groups and foster an environment where individuals feel confident in raising concerns about fatigue without fear of negative repercussions. Fatigue related factors shall be raised during:
 - Risk assessments,
 - Face to face discussions,
 - Notice boards, HSE alerts, event reports and investigation findings,
 - Permit to work and planning sessions,
 - Operations meetings,
 - Shift handovers, and
 - Daily pre-start meetings HSE meetings.

1.3. Performance Monitoring

Monitor and Review of Fatigue related risks

- Management of fatigue related risks shall be enabled through the availability of data and monitored periodically. Data shall include the following:
 - Number of incidents and near misses where fatigue has been identified as a causal factor,

- Number of hours overtime worked at each facility,
 - Number of days over cycle worked at each facility, and
 - Number of Fatigue Risk Assessments forms completed at each facility.
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2. Roles and Responsibilities

2.1. Roles and Responsibilities

Onshore, Offshore, Drilling, Project and Corporate General Managers

- Effectively plan and resource shifts, rosters, activities and travel in such a way that it reduces the risk of fatigue,
 - Implement processes to manage accrued leave balances and set maximum limits of leave accrual to encourage personnel to use it,
 - Fill vacant positions as soon as reasonably practicable and maintaining a relief pool of personnel in high demand areas where fatigue is a risk.
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Location Managers

- Manage overtime, shift swapping and on-call duties to minimise fatigue risks,
 - Provide written authorisation for working days in excess of a roster (over cycle) and this shall be by exception only as per the [Administration of Overcycle \(Operations\) Standard](#),
 - If it is reasonably practicable, on completion of a roster, ensure personnel leave the facility on the first available flight or transport. However, consideration must also be given to travel time to the individual's place of residence, Review and accept or reject request for shift extension or work over cycle via the completed [Fatigue Risk Assessment Form](#),
 - Review and accept or reject [Fatigue Risk Assessment Form](#) for individuals who are requested to work over-cycle. Ensure only in exceptional circumstances shall an individual be requested to work over-cycle by more than seven days,
 - Schedule work that allows personnel enough time to physically recover. The following factors shall be considered before planning the work schedule:
 - Allocation of adequate rest breaks, regular eating and rehydration times,
 - Scheduling safety critical work during daylight hours where practicable, and
 - In operational situations where a particular job is likely to exceed 16 hours, relief for personnel shall be planned for the job.
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Superintendents
and Team Leads

- Ensure anyone who has worked in excess of 14 hours is provided with transportation to their accommodation, if it is offsite,
 - Consultation with the Health team is recommended in cases where risk factors are identified for an individual and additional support may be required.
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- Ensure that fatigue is considered in any Integrated Safe System of Work (ISSOW) risk assessments and Job Hazard Analyses (JHAs) undertaken. As part of the risk assessment, the following shall be considered:
 - Shift hand over, change over time and travel time,
 - Adequate rest shall be allowed between finishing and starting two alternate shifts after night shifts allowing for a rest break of at least 24 hours,
 - Sudden shift changes shall be avoided, particularly those involving night shift work,
 - Section 1.2 of this Procedure including considerations for work design, planning, overtime and Overcycle.
 - If a request to extend work hours up to 14 hours is required, the approval for extra hours shall take into account any other extended work hours that the same individual has already completed,
 - Confirm that:
 - Transport arrangements for personnel to their accommodation have been put in place, if accommodation is offsite and the individual has worked 14 hours or more,
 - Drivers comply with the [Driving Standard](#) well as all applicable legislations relating to traffic safety and driving hours, and
 - Where applicable, review journey management plans with individuals who are working shift work and may travel long distances to and from the work site.
 - If concerned that an individual is showing evidence of fatigue:
 - Consult with the individual, discuss the observation and complete a [Fatigue Risk Assessment Form](#),
 - Review the completed [Fatigue Risk Assessment Form](#) and agree on immediate action,
 - In cases where medical assessment is required, refer the individual to the Site Medic, and
 - Provide personnel with regular rest breaks. Schedule the breaks to provide personnel with adequate recuperation and refreshment time, during and between periods of work. Rest breaks shall not be missed or accumulated to shorten a work period.

Site Medics/Health
Team

- Provide information and advice to leaders and workforce on fatigue related risks,

- Facilitate assessment of personnel at risk of fatigue and provide appropriate medical advice and treatment,
 - Support management of fitness for work including the assessment of personnel with sleep disorders and other health and medical conditions that have an impact on an individual's ability to perform safely and effectively at work,
 - Ensure adequate education and promotion of tools and resources on fatigue and sleep are available.
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All personnel

- If requested to undertake overtime hours, report to your Team Lead if you have worked any shift in excess of 12 hours in the preceding 5 days,
 - If you are experiencing symptoms of fatigue e.g. experience difficulties staying alert during a shift, you shall inform your Team Lead,
 - Refrain from driving or operating machinery, including heavy machinery if feeling fatigued in compliance with the Driving Safety Standard,
 - Report any medical condition or medication you are taking to the Site Medic and your supervisor if it causes, or may cause signs and symptoms of fatigue, levels of alertness, concentration etc. You will be managed as required in accordance with the [Fitness for Work Standard](#) and supports made available such as Employee Assistance Program (EAP).
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3. Reference and Compliance Documents

The documents listed below are relevant to the execution of this Procedure:

Reference documents (R) are documents referred to in the course of completing this Procedure

Compliance documents (C) include all standards, regulatory governance, contracts, business rules or policies applicable to this Procedure.

Document Name	R	C	Document Number
Policies			
Health, Safety, Security, Environment and Quality Policy		C	0000-AH-POL-70000
Standards			
Fitness for Work Standard	R	C	0000-AN-STD-60023
HSE Hazard and Risk Management Standard		C	0000-AH-STD-60003
Operations Work Arrangements Standard	R	C	0000-AN-STD-60029
Incident Reporting and Investigation Standard		C	0000-AH-STD-60050
Driving Safety Standard	R	C	0000-AH-STD-60020
Procedures			
HSE Hazard and Risk Management Procedure	R		0000-AH-PRC-60034
Specifications, Guidelines, Work Instructions, Forms, Templates			
Mental Health and Wellness Guideline	R		0000-AN-GLN-60011
Fatigue Risk Assessment Electronic Form		C	0000-AN-FRM-60037
Fatigue Risk Assessment Printable Form		C	0000-AN-FRM-70087

Safe Work Australia Guide for managing the risk of fatigue at work	C	ISBN 978-1 74361-260-6 ISBN 978-1 74361-261-3
Managing Fatigue in the Workplace: A Guide for Oil and Gas Industry, International Petroleum Industry Environmental Conservation Association (IPIECA) and International Association of Oil and Gas Producers (OGP)	C	IOGP Report No 626
Fatigue in fly-in, fly-out operations: Guidance document for the oil and gas industry. International Petroleum Industry Environmental Conservation Association (IPIECA) and International Association of Oil and Gas Producers (OGP)	C	IOGP Report No 536
National Offshore Petroleum Safety and Environmental Management Authority, Guidance Note – Avoiding Fatigue, 21/05/2020	C	N-09000-GN1397 A392817

4. Abbreviations and Definitions

ABBREVIATION / TERM	DEFINITION
ALARP	As Low As Reasonably Practicable
EAP	Employee Assistance Program
Fatigue	Fatigue is the loss of alertness that is characterised by reduced mental and/or physical functioning. In the short term fatigue reduces individuals' capacity to perform safely and effectively and raises the risk of injury and accidents. In the longer term, fatigue can have serious adverse impacts on individual's mental and physical health.
FFW	Fitness for Work
ISSoW	Integrated Safe System of Work
JHA	Job Hazard Analysis
Location Manager	OIM, Production Manager, Drilling Manager
Overcycle	Refers to days worked in addition to an Employee's rostered work days at a Company facility.
OIM	Offshore Installation Manager
Shift Work	A work activity scheduled outside standard daytime hours, where there may be a handover of duty from one individual or work group to another; a pattern of work where one employee replaces another on the same job within a 24-hour period.

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Electronic Endorsement and Approval

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