

# Napping at Work

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*...a good fatigue strategy or  
dismissible offence?*



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Napping at Work

### What is the difference between micro sleeps and napping?

*Microsleeps are very brief episodes of sleep (usually seconds) that occur while you are awake. You might not even be aware that you're experiencing them. They are a symptom of sleep deprivation and occur because the need for sleep has become an absolute must for your brain. You cannot talk yourself out of a microsleep but you can prevent it from happening by acting on the early symptoms (having heavy eyelids and head-to-chest nodding).*

## The evidence – Is napping an effective control for fatigue risk?

There is a growing body of evidence that strategic napping can be used to increase alertness and performance in an operational setting. One study has shown that the use of strategic napping can improve the alertness and performance of long-haul flight pilots in subsequent critical phases of the flight (i.e. descent and landing) .<sup>1</sup>

The negative effects of napping are sleep inertia, the potential of the nap to impact upon subsequent restorative sleep periods and a lack of environmental awareness if napping in uncontrolled high-risk environments. Sleep inertia is the experience of sleepiness and/or reduced performance immediately after waking from a nap. This is largely controlled by limiting a nap to 20 minutes and/or engaging in activities (e.g. meal, coffee, conversation, physical activity) to ensure that the inertia is overcome prior to commencing any safety critical work.

1. Rosekind, M.R., Graeber, R.C., Dinges, D.F., Connell, L.J., Rountree, M.S. and Gillen, K. *Crew Factors in Flight Operations IX: Effects of Planned Cockpit Rest on Crew Performance and Alertness in Long-Haul Operations* (NASA Technical memorandum 108839). NASA Ames Research Centre, California, 1994.

## What are the organisational legal responsibilities?

### **Australian legislation (s19 WHS Act) states:**

“A Workplace has the primary duty of care to ensure, so far as reasonably practicable, the health and safety of workers while they are at work...”



If someone needed a meal and drink at their break to revive and rehydrate would you allow them to eat and drink? I hope most readers would agree this seems “reasonably practicable.”

Thus, knowing that the average shift worker gets less than 6 hours sleep when they are working night shift, and by virtue of them doing night shift they are subject to circadian disruption, it would also seem “reasonably practicable” to allow napping during shift work as a fatigue management strategy if desired during their break?

Thus, in a shift working environment, if you do not allow napping as a fatigue control, are you fulfilling your duty of care?





## What are other workplaces doing?

I am witness to a variety of attitudes, beliefs and experiences within workplaces from very basic to extremely progressive ways of approaching napping in the workplace. The consequences of not managing fatigue in the workplace are dire and can be fatal. Once aware of the negative consequences of suboptimal fatigue practices, organisations are generally aligned in their desire to improve fatigue management .

An example of a basic approach is where an organisation had formally documented in their Fatigue Management Procedure;

“Under no circumstances are workers to sleep at work. Where excessive fatigue is reported the supervisor is to implement controls (i.e. have the person driven home).”

The potential consequences of taking this position include:

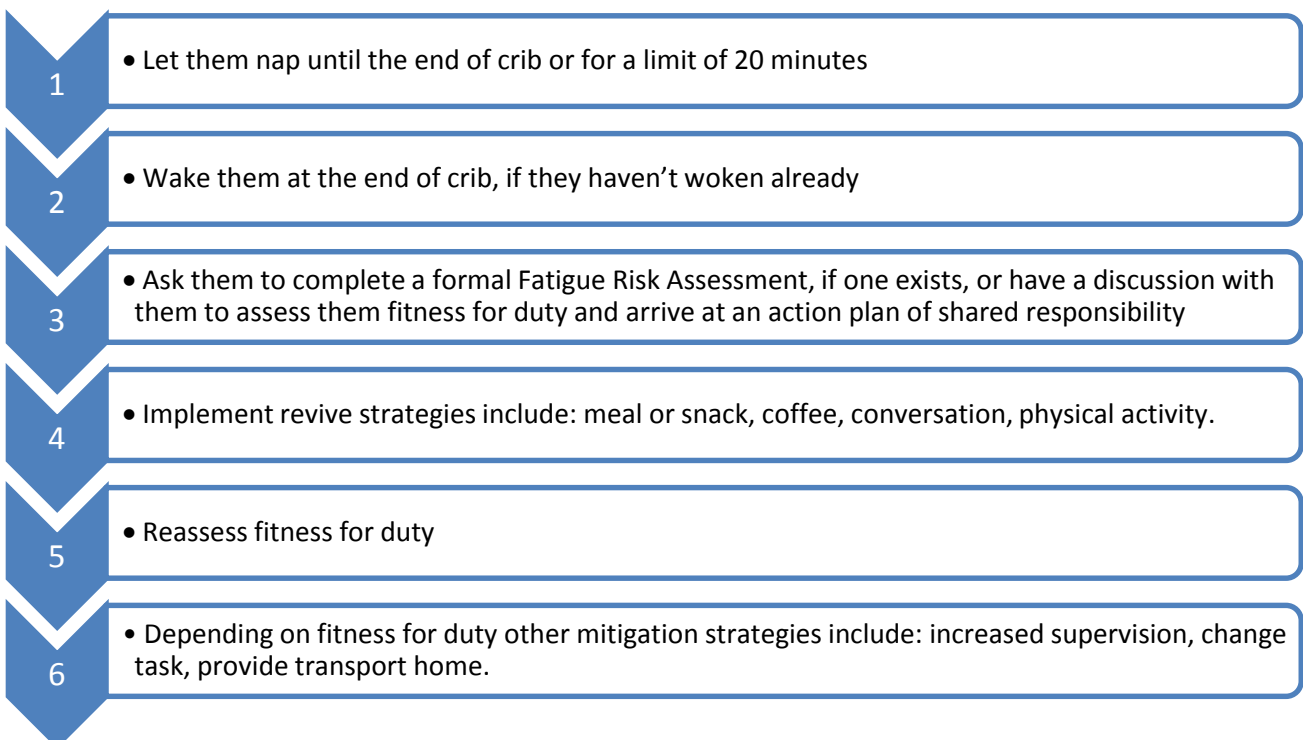
- Lost production as a result of sending the person home. The person is likely never to report fatigue again due to the lack of input and autonomy on how to manage their impairment;
- Lost production due to personnel ‘hiding in a dark corner’ to avoid being caught napping.
- Promote a culture where fatigue reporting is discouraged due to the perceived punitive outcomes, which creates a reactive rather than a pro-active safety culture;
- Personnel fail to manage their fatigue, which may increase their risk of a fatigue-related error; or worse result in a fatigue-related accident.

What do the expert or more progressive approaches look like? I have been putting the following scenario to leaders and supervisors in our Fatigue Leadership courses recently and asking them what they would do.

It is second crib (10 hours into the shift) and you walk into a crib room at the start of crib. One of your crew members has their head on the crib room table and they are asleep.

The following action plan is quite consistently reported and considered a reasonable approach to managing the situation.

### *Fatigue Action plan*



### What is the worker's duty of care in a high-risk work environment?

*Australian legislation (s28 WHS Act) states:*

- *"Take reasonable care for own safety;*
- *Take reasonable care to ensure acts or omissions do not adversely affect the health and safety of others;*
- *Comply with reasonable instructions...policy or procedures... from the Workplace..."*

*Failure to comply with this duty could result in the termination of employment such as in the case of Parish v Mt Arthur Coal Pty Ltd T/A Mt Arthur Coal [2016] FWC 6427 (13 September 2016), where the worker was guilty of serious safety breaches in failing to report, in accordance with the workplace procedure, his fatigue to a supervisor, and sleeping for more than two hours during a shift. The ruling indicated that had the manager been notified, he would have "managed the risk by implementing a measure such as giving him a fatigue break (napping as a potential option), sending him home, or rotating his tasks," which were listed control strategies in the companies Fatigue Management Procedure.*

### What are the reasonable options for napping in the workplace?

The evidence would indicate that napping can be used as an effective control to reduce the risk of a fatigue-related incident or accident, but does present other risks (e.g. inertia, sleep disruption, lack of immediate environmental awareness). It would also seem reasonable to allow and provide for napping opportunities for shift workers.

However, there is a duty of care and reasonable expectation of the worker to take responsibility and be transparent with respect to their experience of fatigue and their fitness for work. Thus, it is incumbent on the workplace to provide a clear, systematic and supportive approach to fatigue, and specifically napping, to ensure a culture of responsibility, transparency, support and shared action prevails.

Due to the identified risks of napping, it should be done in a controlled manner and environment, particularly in high risk work environments. Leaders of a business will need to decide whether to include napping as a formal control in the workplace fatigue procedure. In doing so, it will also need to be decided whether to use a prescriptive or flexible approach, as outlined below.

1. Prescriptive approach: Detail where (locations), when (personal breaks, needs basis) and how (supervisor approval) napping will occur in the workplace.
2. Flexible approach: Napping allowed as a fatigue control only after supervisor approval to ensure it is monitored and managed.

Ultimately, the final decision will be up to the leaders to determine what they believe is "reasonably practicable" to ensure the health and safety of their workers within the context of their work environment, risk appetite, knowledge, attitudes, beliefs and experiences with respect to fatigue management.

## What can organisations do to help minimise the risk of fatigue?

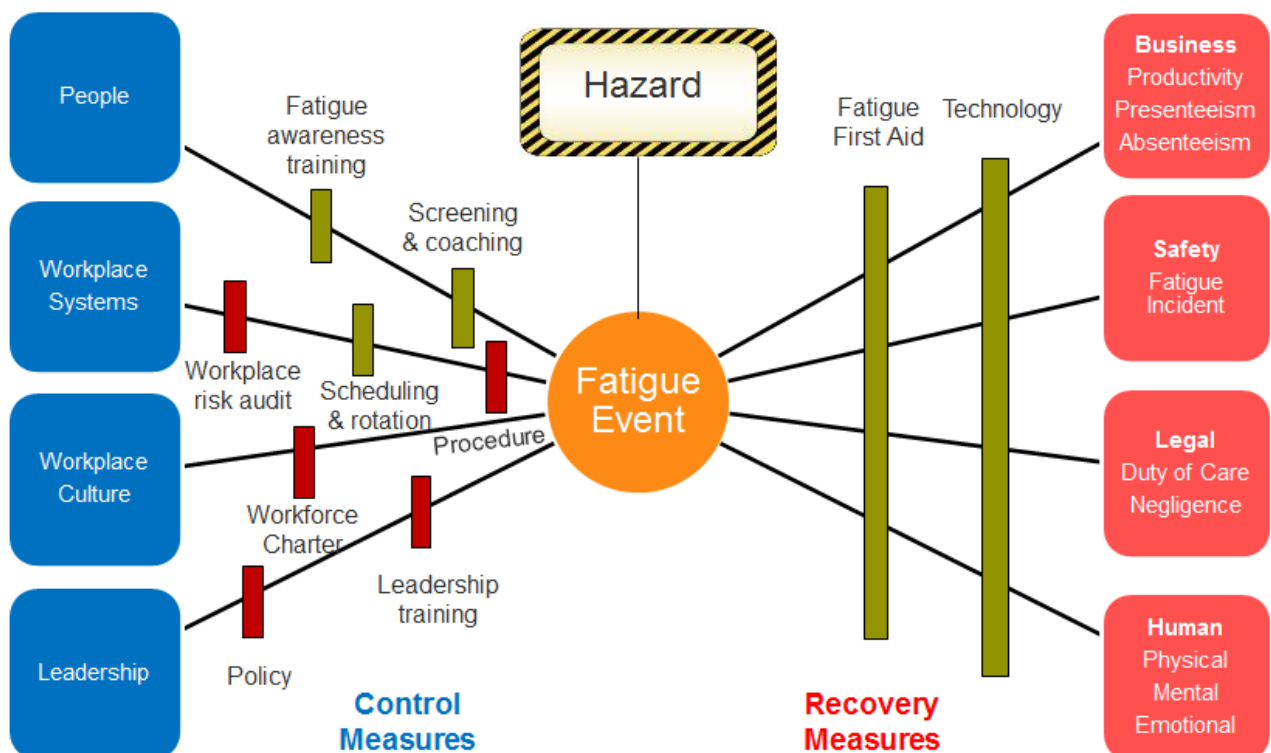
In shift working work environments it should be accepted that fatigue will occur at some point. Where fatigue-related risk in the workplace has been identified, it is a legislative requirement to ensure the health and safety of people in the workplace through the implementation of risk mitigation strategies.

The bowtie model below, identifies a range of risk factors that can lead to a fatigue event, which can subsequently escalate to a number of undesirable outcomes, including a fatigue-related accident. Thus, a problem that has multiple risk factors will require multiple control mechanisms as part of a Fatigue Risk Management System (FRMS) to avoid fatigue-related incidents occurring.

Fatigue first aid is an extension to the concept of first aid, whereby action is taken or assistance given to any person suffering symptoms of fatigue, with a view to ensure the health and safety of that person, and the risk they may pose to others. The overall goal of Fatigue First Aid is to respond preventatively to the early signs of fatigue to prevent the condition from worsening, and/or promote recovery. This is in preference to responding reactively to escalating symptoms of fatigue whereby an individual ability to make conscious or rational decisions to prevent an accident from occurring is impaired.



**Fatigue First Aid** provides a clear, systematic and demonstrable process that enables personnel to be trained to basic skill levels to enable them to preventatively respond to avoid a fatigue-related incident. Ethos Fatigue First Aid approach has a range of specific resources (including training packages and Wakey App) to make the process as user-friendly as possible.



## Proactive management of fatigue?



### Fatigue Awareness Training

**2.5 hours – 20 people max**

Fatigue Awareness Training begins with a general introduction to fatigue; its symptoms, prevalence and consequences; and the factors that contribute to fatigue. Workplace factors discussed are;

- Legislative requirements for managing fatigue
- Managing risk factors during shift work
- Encouraging employees to respond proactively to early signs of fatigue
- Creating a culture that develops a support environment

The second half informs employees about the individual risk factors of fatigue and how to help prevent fatigue. The impact of each of the following areas will be discussed, as well as, methods to manage each of these risk areas;

- Sleep
- Mental health
- Nutrition
- Physical activity
- Smoking, drugs and alcohol
- Situational factors



### Fatigue Leadership Training

**4 hours – 10 people max**

Fatigue Leadership is essential knowledge if you are in a leadership role and responsible for the health, safety and wellbeing of others. Getting people to use fatigue management strategies effectively is one of the most challenging issues for a leader.

#### **This course covers;**

- Engaging people in fatigue prevention and management
- Monitoring the implementation of fatigue management strategies
- Applying rostering schedules inline with current policy and procedure
- Recognising breaches of fatigue management policies, procedures and regulations
- Developing and assessing staff competence in fatigue management
- Providing feedback to staff on shortcomings in fatigue management skills and knowledge
- Reporting on the implementation of fatigue management procedure



### Wakey App

Wakey App records the symptoms, causes and strategies used to control fatigue by the workforce. In time a sequence of activities and actions are identified, which will create a preferred path or pattern to manage fatigue...a solution!

Designed to ensure you follow a clear and demonstrable system, whilst concurrently collecting data to ensure you are monitoring and can demonstrate compliance with the legislative requirements of ensuring the health and safety of workers while they are at work.

#### **App includes;**

- Monitoring and compliance
- Legal duty of care
- Education and engagement
- Real time fatigue statistics



### Consultancy

Benchmark your organisation and developing a customised plan to more effectively manage fatigue. Understand your business' key fatigue risks, the incidents of fatigue, the effectiveness of current policies and procedures to ensure overall compliance with the legislative requirements.

#### **Consultancy includes;**

- Risk Assessment development & application
- Policy and procedure review and design
- Union management
- Fatigue risk management system development
- Workforce consultation
- Roster review



## Refreshing fatigue management?



### Fatigue Procedure Training

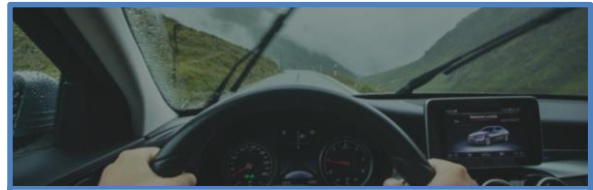
**1 hours – 20 people max**

This workshop incorporates workplace specific Fatigue Management Plan (Procedure)\* to ensure there is a clear, systematic and consistent response to help the workplace make informed decisions about reducing or eliminating fatigue risks.

The workshop will help the workforce ask the right questions, at the right time and take appropriate actions.

**This course covers;**

- Applying Mandatory Hour of Work Requirements
- What do I need to do and when I experience Fatigue Symptoms?
  - Fatigue Risk Assessment (Check)
  - Applying Fatigue Risk Assessments (Checks) to Scenarios\*



### Journey Management Plan

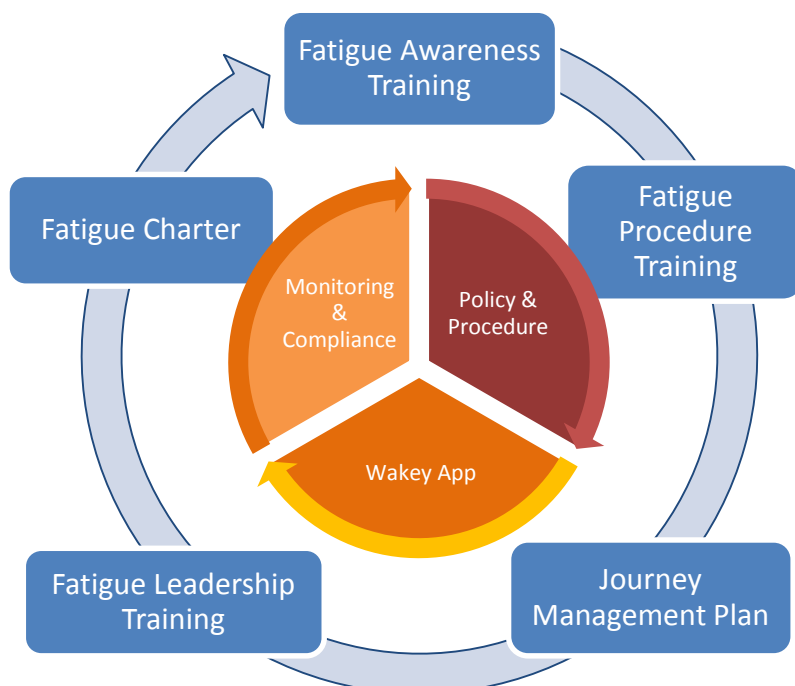
**Development & Application**

Fatigue is a factor in 20-30% of all road deaths, which is comparable to deaths related to speeding and alcohol. Any workforce that works extended or night shifts and has personnel travelling greater than 20 minutes one-way to or from work are at increased risk of a fatigue incident. Journey Management Plans (JMP) are one method of mitigating this risk, which will see some worksite require the completion and submission of JMP's as part of their broader Fatigue Management Plan (FMP).

**This course covers;**

- The symptoms of fatigue
- Applying good journey management principles
- The risks of driving under the influence of fatigue
- Expectation of when individuals should take action
- Developing individual Journey Management Plans

### Fatigue Training Model



### Fatigue Charter

**1 hours – 20 people max**

A Fatigue Management Charter is an agreement between people working within a workplace on how to manage fatigue, if and when it occurs. The Charter forms part of the broader Fatigue Management System and includes a vision, commitments, and actions designed to meet those commitments.

There are many benefits to creating and endorsing a Fatigue Charter, including improving the health, safety and wellbeing of your workplace. The Charter will help.

**This course covers;**

- The development and application of Fatigue Management Charter.
- Sets expectations of all people working within a workplace regarding how they are to respond if they or a colleague is experiencing the effects of fatigue

# About the author

## Dr Trent Watson

*CEO & Workplace Health & Safety Consultant*

*PhD, BHSc (N&D) GAICD*

Trent has 17 years' experience working and reviewing the impact of health- and fatigue-related interventions in the mining, transport, maritime, utilities, food and other commodity industries.

Trent's experience, capability and currency of providing subject matter expertise regarding fatigue is illustrated by working in the area for more than a decade with a range of multinational companies.



## Areas of expertise

1. Fatigue Risk Assessment (including the facilitation and drafting the Risk Assessment documents)
2. Subject matter expertise (including assisted with enquiries from workforce, unions and regulators)
3. Provision of ongoing guidance of FRM system design
4. Workforce awareness training
5. Supervisor training

## Clients



**Newcastle**

8 Denison Street  
Newcastle West, NSW 2302  
T: [02 4962 8700](tel:0249628700)  
F: [02 4962 8701](tel:0249628701)

**Lake Macquarie**

Suite 7, Level 2 Specialist Medical Centre  
LM Specialist Medical Centre  
6-8 Sydney Street  
Gateshead NSW 2290  
T: [02 4962 8700](tel:0249628700)  
F: [02 4962 8701](tel:0249628701)

**Sydney**

Level 1, 65 Walker Street  
North Sydney, NSW 2290  
T: [02 9923 8246](tel:0299238246)  
*Workplace Services Only*

[enquiries@ethoshealth.com.au](mailto:enquiries@ethoshealth.com.au)



## ABOUT US

Ethos Health was formed in 2009 as a result of a merger between Physio At Work and Clued on Food, two locally owned and based allied health business with a history of collaboration in delivering allied health services to workplace health and safety clients and a shared vision of providing better care to members of our community through innovation, clinical expertise and strategic alliances with the medical profession.

In 2012, Penn Health acquired a majority shareholding in Ethos Health which brought together Penn Health's online exercise and nutrition platform ClickFit with Ethos Health's demonstrated excellence and expertise in chronic disease management, as well as, workplace health and safety products. This partnership has yielded several successful products, including type 2 diabetes and weight loss programs delivered via online print or mixed media formats.

Ethos Health continues to develop and deliver clinical and consulting services to individuals and organisations across Australia and New Zealand via our primary and satellite clinics.

*"We inspire, create and deliver solutions to improve the health and safety of people and organisations"*

## Website

[www.ethoshealth.com.au](http://www.ethoshealth.com.au)