

Fatigue Management

September 2024

Purpose

The purpose of this policy is to highlight the effects and risks of employee fatigue, the shared responsibility to manage it appropriately, the preventative actions that should be planned and taken to minimize the associated risks, to include establishing hours of service limitations.

Scope

The policy applies to all employees, and contractors, while performing on duty work or carrying out activities on behalf of E Light Electric Services Inc. to include:

- Administrative employees working in offices or in construction trailer offices.
- Field supervision and employees performing work on construction projects.
- Employees working at remote locations where extended travel is necessary.
- Employees who undertake driving as part of their roles.
- Employees who undertake business travel which includes air travel and rental vehicles as part of their roles.

Roles and Responsibilities

Management

1. Establish and implement a comprehensive fatigue management policy that outlines the importance of fatigue management, including definitions, objectives, and procedures.
2. Provide training for all employees regarding the effects of fatigue, recognizing signs of fatigue, and strategies for managing fatigue effectively.
3. Implement policies regarding work scheduling that minimizes the risk of fatigue, including considerations for shift lengths, breaks, and adequate time off between shifts.
4. Encourage reporting of fatigue-related concerns without fear of repercussions.
5. Conduct regular risk assessments to identify potential fatigue-related hazards in the workplace and implement measures to mitigate these risks.
6. Establish support systems, such as access to counseling or wellness programs, to help employees manage stress and fatigue.
7. Foster an open communication environment where employees feel comfortable discussing fatigue issues and suggesting improvements to the fatigue management program.
8. Regularly evaluate the effectiveness of the fatigue management program and make necessary adjustments based on feedback, incidents, or changes in work conditions.
9. Demonstrate commitment from management by prioritizing fatigue management in all aspects of the company's operations and leading by example.

Supervisors

1. Ensure that the fatigue management policy is effectively implemented and adhered to.
2. Regularly observe work conditions and employee behavior to identify signs of fatigue and take appropriate action.
3. Create work schedules that account for adequate rest periods and minimize excessive overtime, ensuring compliance with the fatigue management policy.
4. Facilitate training sessions on fatigue awareness and management for employees and provide ongoing support and resources.
5. Encourage open dialogue about fatigue-related concerns, ensuring employees feel comfortable discussing their fatigue levels.
6. Ensure that any fatigue-related incidents or near misses are reported, documented, and addressed promptly.
7. Include fatigue management considerations in performance reviews, acknowledging employees who demonstrate good fatigue management practices.
8. Model good fatigue management behaviors by taking breaks, managing their own workload, and prioritizing health and safety.
9. Gather feedback from employees regarding the fatigue management program and suggest improvements based on their input.
10. Be prepared to respond effectively in situations where fatigue leads to safety concerns, ensuring that appropriate actions are taken to protect employees.
11. Communicate emergency procedures for situations where fatigue may lead to critical safety issues, ensuring that all employees understand the protocols.

Employees

1. Recognize and monitor their own fatigue levels, understanding the impact of fatigue on performance and safety.
2. Inform supervisors or management of any signs of fatigue, concerns about work schedules, or the need for additional breaks.
3. Follow the company's fatigue management policies and procedures, including taking scheduled breaks and not exceeding recommended work hours.
4. Report any fatigue-related incidents or near misses to supervisors promptly to ensure they are addressed.
5. Engage actively in training sessions related to fatigue management and apply learned strategies in their daily work.
6. Practice good health and wellness habits, such as getting adequate sleep, managing stress, and maintaining a balanced lifestyle. Look out for co-workers who may be showing signs of fatigue and encourage them to take breaks or seek help if needed.
7. Provide constructive feedback on the fatigue management program and suggest practical improvements based on personal experiences.

8. Be aware of emergency procedures related to fatigue and know how to respond if fatigue poses a safety risk in the workplace.

Workplace Risk

The first step in mitigating fatigue in the workplace environment is to identify risk that impact fatigue. Workplace environment, schedules, staffing levels, at home activity are the areas that primarily affect fatigue. Adequate manpower to complete job task reduces extra work upon individuals and minimizes the effect of fatigue. Scheduled activities, their frequency or deemed importance can place additional stress upon an employee. Clearly stated expectations of daily work, projects, response to abnormal field events all can reduce fatigue. Activities away from work can impact the individual and play a part in workplace fatigue.

All personnel shall ensure that they are well rested and mentally prepared for their commute to work and the subsequent activities they will encounter during the day.

Fatigue Signs, Effects and Mitigation

It is important that fatigue - as well as its signs, effects, and remedies – be clearly defined. Fatigue is described as an acute and ongoing state of tiredness that leads to mental and/or physical exhaustion and prevents people from functioning within normal boundaries. It is normal to feel tired after prolonged mental or physical effort at work. Fatigue, however, is more than just feeling tired.

Fatigue can accumulate over time, and may be caused by:

- Work-related factors such as length of time worked, inadequate rest breaks and/or sleep, harsh environmental conditions.
- Lifestyle factors such as poor quality of sleep, family responsibilities, social life, commuting time to and from work.
- A combination of work-related and lifestyle factors

Signs of Fatigue

- Headaches and/or dizziness
- Difficulty keeping eyes open.
- Constant yawning
- Muscle weakness
- Lacking energy

Immediate Effects of Fatigue

- Lack of concentration
- Reduced short-term memory.
- Increased errors
- Slower reaction times
- Impaired decision-making and judgment (including being unaware of the state of fatigue)
- Reduced immune system function.

Longer-Term Effects of Fatigue

- High blood pressure and/or heart disease
- Depression and/or anxiety

- Diabetes and/or gastro-intestinal disorders

Fatigue Mitigation

Sleep

Sleep is the only effective long-term strategy to prevent and manage fatigue. While tired muscles can recover with rest, the brain can recover only with sleep. An adult generally requires seven to eight hours of sleep daily, taken in a single continuous period. When individuals get less sleep than they need in a day, they build up a sleep debt. Each additional day without enough sleep increases the debt which, when it becomes large enough, causes fatigue. The only way to reduce or cancel a sleep debt is by sleeping additional hours.

Rest Periods

Established rest periods taken throughout the workday provide time to recover from work activities and relieve stress. Stress is associated with fatigue and plays a part in the effect on fatigue. Workers should take the time for lunch breaks away from the work area whenever possible.

Establishing Work Limitations

Work limitations which include 'not to exceed' hours provide an environment that aids in fatigue managing.

Establishing work limitations either by policy direction or specific to jobs prior to work started can relieve any doubt or confusion managing a person's well-being when it comes to fatigue.

Scheduling work activities is also an integral part of managing fatigue. Clearly defined job types or maintenance planning managed; accordingly, will not cause excessive hours, or conflicts with other priorities. Use of scheduling tools can aid and identify ahead of time if an employee will be working excessive hours.

Policy

Working Requirements

- On duty work shall not exceed 16 hours in any 24-hour period. The on-duty limit of 16 hours includes the commute to and from the work site. Employees who have an on-duty time that reaches 16 hours shall be required to have at least 12 consecutive hours off before reporting back to work.
- Employees who have an on-duty time that reaches 12 hours shall have at least 8 consecutive hours off before reporting back to work.
- Do not work over 60 hours during a 7-day continuous period. If exceeded, a minimum of 24 consecutive hours off from the work environment is mandatory.

Driver Requirements (Non-Commercial)

- Employees shall not drive more than 10 hours within a rolling 24-hour period.
- The maximum driving time before taking a break is 4 hours. After driving 4 hours a 30 min break is mandatory.

- Attempt to take 15 min breaks for every 2 hours of driving.

Business Travel Requirements

- Business travel that includes the use of a personal vehicle or rental car, commute travel to and from the airport from home, work site, hotel, rental agency, and any aircraft flight time; shall not exceed 14 hours in a rolling 24-hour period.

Exceeding Hours of Service

Under extraordinary situations or emergency events hours of service may be in jeopardy of being exceeded and must be discussed with your supervisor and approved by the Construction Manager or Project Manager prior to continuing work. During this conversation, effects of continued work past the hours of service should be discussed, additional risks identified and understood. If possible, implore fatigue mitigation strategies such as mandatory break period, stimulation, check-in upon fatigue status, and alternate plans for driving, or sleep accommodations after the work is completed. Follow up documentation or next day email pertaining to work-related event(s) can detail any related hours-of-service exceedance.

Employees driving commercial vehicles shall be subject to the FMCSA hours of service requirements.

Employee Information and Training

Employees can contact the Director of Education and Loss Prevention for any issues, concerns or questions related to their well-being due to fatigue.