

# FATIGUE MANAGEMENT POLICY

## Overview

Three Shires Limited acknowledges that the management of fatigue is crucial in ensuring effective health and safety in the workplace. Therefore, we will identify all safety critical working activities and manage fatigue in such circumstances to ensure compliance with legal duties as a minimum, taking account of The Health and Safety at Work Act 1974, its statutory provisions and The Railways and Other Guided Transport Systems (Safety) Regulations 2006.

All Three Shires Limited employees understand that the impact of fatigue cannot be underestimated. We know that fatigue will increase risk substantially; especially where our employees may have to work extended hours or night shifts in safety critical environments.

## It is our policy to:

Take the following steps to ensure that fatigue is managed effectively in circumstances where it may impact on any Three Shires Limited employee or contractor:

- Consult with our employees and contractors regarding fatigue, ensuring that they are aware of fatigue and understand the associated risks.
- Ensure as appropriate, that working hours and patterns are fully considered in our risk assessments for safety critical activities, with reference to HSE guidance, including the HSE fatigue index.
- When planning contract work, consult our employees and contractors with regard to shift patterns and working hours, taking account of each individual's health and where possible their personal circumstances.
- Ensure that where the physical environmental can increase stress, appropriate controls are introduced to manage this effectively.
- Ensure through robust record keeping that all working hours are recorded, including travel times, overtime, on call working hours and changes that may occur as example through shift swapping or moving between contracts.
- Review our working time records, proactively to identify the potential for fatigue to occur, ensuring in doing so, that we engage with our managers and supervisors to ensure individual factors are taken into account.
- Plan workload and working activities to allow for breaks and rest periods, both between shifts and between working days. Ensuring that employees take such breaks, irrespective of their willingness to work longer hours.
- Ensure that where contracts require night work we discuss with our employees the arrangements for rest, taking account of sleep disturbance and the potential for 'sleep debt', in particular where this work is intermittent or of an 'on call' nature.
- Ideally, shifts not to exceed 10 hours working time (plus up to 2 hrs travelling which can be either commute time to a "Normal place of work (ie; Offices/Yard) and/or "Travel for Work to a worksite....BUT this can be extended if required to the maximum of 12 hours worked plus 2 hours door-to-door (14 hours in total) but this MUST BE Fatigue Assessed at the 12 hour point and if required, an additional Fatigue Management Plan to be completed.
- No more than 6 Shifts to be worked in any 7 days so there is ALWAYS a clear 24 hour break within a 7 day period.
- There MUST be a clear "Minimum 12-hour rest period between consecutive shifts"

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|--------------------------------------------|---------------------------|--------------|---------------|----------------|--------------|
| Filename:                                  | Fatigue Management Policy | Approved by: | Jeremy Willis | Issue Version: | 09           |
| Reference:                                 | PO06                      | Position:    | H&S Manager   | Issue Date:    | January 2022 |
| Category:                                  | Policies                  | Signature:   | J. A. Willis  | Last Reviewed  | January 2026 |
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All employees are encouraged to take responsibility for managing their own fatigue levels, especially where this may be influenced by factors outside the workplace. Employees are required to take all provided breaks at work and between work and ensure they advise Three Shires Limited of any health conditions that may increase fatigue levels.

**Principal legislation**

Management of Health and Safety at Work Regulations 1999, amended 2006  
Health and Safety at Work *etc.* Act 1974 (HSWA)

**Guidance**

ORR: Managing Rail Staff Fatigue  
HSE Leaflet INDG430: How to tackle work related stress  
NR/L2/OHS/003/03 – Exceedance Management

Print: James Lloyd (Managing Director)

Date: 28<sup>th</sup> January 2026

Signed

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