



Date: 22 February 2023

Item: Pan-TfL Fatigue Management Programme Update

This paper will be considered in public

1 Summary

- 1.1 In February 2022 we provided the Panel with an overview of our Fatigue Management Programme and approach to developing a pan-TfL Fatigue Management Plan.
- 1.2 The Panel noted the paper and asked that we further consider non-operational colleagues within the risk screening, ensuring effective ongoing governance of the Programme, information on performance indicators, and feedback on Bus Driver Fatigue Detection technology trials.
- 1.3 This paper provides an update on the Fatigue Programme, including these considerations. The paper also shows how our approach to fatigue risk management aligns with our overall Safety, Health and Environment (SHE) risk management plan briefed to the Panel on 16 November 2022.

2 Recommendation

- 2.1 The Panel is asked to note the paper.

3 Summary of Progress

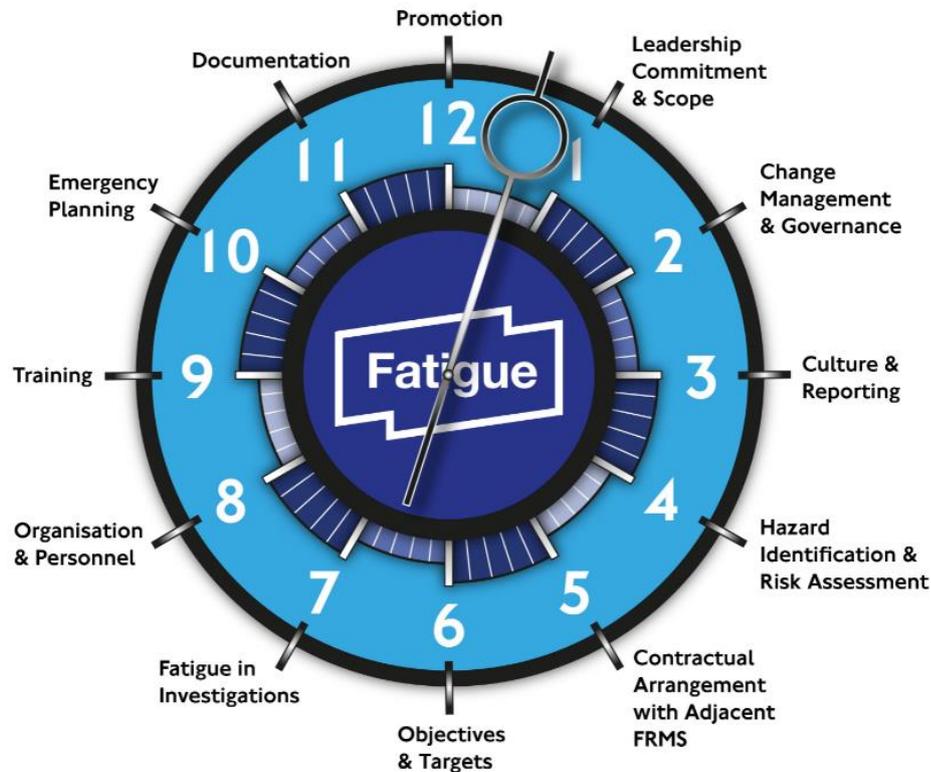
- 3.1 Fatigue is an ongoing risk across transport and wider operations. We use a range of indicators to continually review and improve confidence we are managing this risk, as detailed in Section 4. Detail on our approach to reduce this risk and our Fatigue Management Programme was provided in the **Fatigue paper** considered by the Panel in February 2022.

Launch of Pan-TfL Fatigue Risk Management Plan

- 3.2 Since our previous update, we have launched our Pan-TfL Fatigue Management Plan (FMP) in November 2022, a Vision and Value milestone, a year earlier than planned.
- 3.3 The FMP sets out 12 activity areas for managing fatigue risk, aligned with regulatory and industry best practice. Progressive requirements from minimum to best practice are set out for each activity. Business areas need to meet minimum 'must' requirements, ensuring compliance with standards, but are encouraged to work towards progressive 'should' good practice requirements, continually building maturity in risk management. The full requirements are set out in Appendix 1.

3.4 The Plan has been embedded within our refreshed SHE Management System, which is easier to access, understand and apply.

Fatigue Management Plan: 'Clockface' of 12 fatigue activity areas and requirements



3.5 We have now completed risk screening of approximately 2,300 staff from over 15 different business areas, including colleagues from operational and non-operational roles. These business areas have been prioritised based on levels of fatigue risk, and in ensuring inclusion of a range of functions to fully test and embed our pan-TfL approach. Bespoke area action plans, addressing specific risk factors in these areas, are being developed. We are now entering a phased approach for roll out and continual review of fatigue risk screening across other business areas.

3.6 Supporting the launch of the FMP, progress continues to be made within each of the fatigue activity areas:

- (a) **Hazard Identification and Risk Assessment:** Development of 'fatigue friendly' rosters in response to business changes. Assessments on rosters as part of the reintroduction of the Night Tube and in support of Woolwich Ferry operations since it came into TfL operation have been conducted. Findings and changes are fed back to the business and their trades unions representatives.
- (b) **Training:** Refresh of training materials. We have launched four new fatigue training courses appropriately targeted to positions and proportionate to the level of risk associated with their role. Courses include:

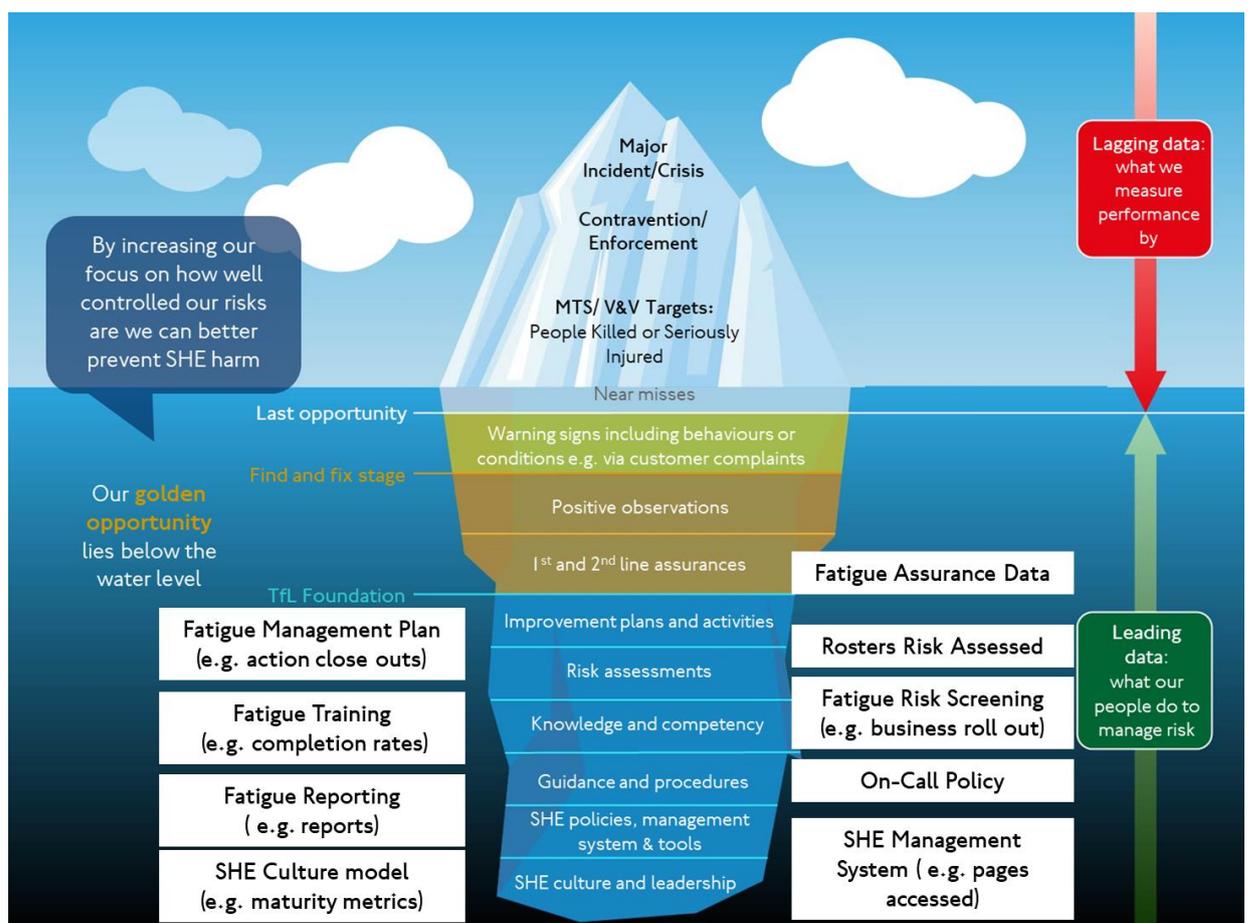
- (i) Fatigue Awareness at TfL – Targeted at all employees, providing an overview of and importance of managing fatigue, and how to take action.
 - (ii) Managing Fatigue at TfL – Targeted at managers, providing an overview of requirements for managers to enable effective management of fatigue for their teams.
 - (iii) Fatigue and Shiftwork Awareness – Targeted at those who work shifts, providing additional detail and guidance on how to proactively manage fatigue.
 - (iv) Fatigue Awareness for Schedulers – Targeted at colleagues who manage, update or otherwise interface with schedules and rosters, providing knowledge on best practice for minimising the impact of fatigue on colleagues who work shifts.
- (c) **Organisation and Personnel:** Developed the ‘Managing Fatigue at TfL’ handbook available to all staff containing advice and actions for improving fatigue, health and wellbeing. We have also developed a guide for colleagues’ family and friends to help them understand impact of shift work and how they can support their loved ones in minimising the impact of fatigue.
- (d) **Fatigue in Investigations:** Trialling a new approach where managers ask questions as part of investigations to help determine whether fatigue may be a contributory factor in incidents. Understanding fatigue helps us address risk.
- (e) **Promotion:** Our pan-TfL FMP allows us to work with business areas to share learnings from fatigue interventions. Our Bus Operator Forum is helping us understand impacts of fatigue detection technology. Feedback from drivers suggests that there have been concerns about technology being used to monitor performance or posing driving risk. A just and fair culture along with clear communication of the purpose of the technology is therefore key in implementation. Using a combination of independent research, communication and education initiatives, we are working to allay concerns.
- (f) **Culture and Reporting:** The Programme is underpinned by our commitment to create a just and fair culture where colleagues feel comfortable reporting fatigue. We continue to promote our digital fatigue reporting process, encouraging individuals to proactively report any fatigue concerns to their managers to prevent incidents. This is aligned with our HR positions to ensure the individual knows they will be supported in doing so, anyone openly and honestly reporting fatigue in advance of an incident will be treated sensitively and without criticism. Implementation has been accompanied by a series of support workshops and drop-in sessions.

4 Understanding Fatigue Management Performance

- 4.1 We now need to increase our efforts to understand the performance and impact of the programme. We know that a mature safety culture requires consideration of performance both in terms of what has happened through incidents, using lagging indicators, and in understanding the use and effectiveness of controls to prevent incidents or harm occurring. We actively encourage leading indicator reporting, including incidents of fatigue so we can work to address them.

- 4.2 Our new FMP and associated tools provide us with wider set of indicators to understand fatigue risk and to focus further improvements.
- 4.3 A range of leading indicators have been identified including completion of fatigue training appropriate to colleagues' roles, incident investigations where consideration of fatigue has been included and measures relating to overtime.
- 4.4 Further performance indicators and measures we can now use due to the launch of the FMP include access to the SHE Management System Fatigue pages, completion of risk screening, delivery of improvement plans and fatigue self-reports.
- 4.5 There are plans to digitise all our fatigue outputs, enabling greater transparency, visibility, and oversight of fatigue related information for performance reporting.
- 4.6 This approach aligns with our **SHE Risk Management plan**, [presented to the Panel in November 2022](#), illustrated within Insights and Prevention Framework 'Iceberg'. Our FMP strengthens activity 'below the waterline' and our indicators help tell us how well they are working and where improvements are needed before harm occurs.

Fatigue Management Plan and Insights and Prevention Framework



5 Governance and Next Steps

- 5.1 The Pan-TfL Fatigue Management Steering Group maintains oversight of the programme. With the launch of our pan-TfL FMP, the group is shifting focus from development to encouraging uptake of the FMP across the business, learning and identifying further opportunities for improvement.
- 5.2 We are now working with our Audit and Assurance teams to ensure business areas are effectively applying and complying with these requirements. Findings will help us further communicate and embed the FMP.
- 5.3 Continued learning has identified need to focus on the wellbeing of our night workers. Building on the success of the Buses fatigue innovation trial, we are assessing the viability of interventions targeted at night workers. We plan to evaluate the use of an interactive walk-in installation designed to effectively communicate evidence-based sleep health information to shift workers. Led by experts from Oxford University's leading sleep research centre, a range of interactive experiences designed to embed learning and resources are provided to support better sleep health. Information is highly accessible and actionable, with strong visuals and exercises used to overcome language and literacy barriers; material is translated into six languages.
- 5.4 We also know that we need to do more to understand the impacts of different rostering patterns on individuals, an issue which affects wider industry, not just TfL. We are currently in phase two of our innovative research trial seeking to better understand the impact of different working hours on an individuals' cognitive performance which will help inform development of further fatigue friendly rostering.

List of appendices to this report:

Appendix 1: Summary of Pan-TfL Fatigue Management Plan Requirements

List of Background papers:

[TfL Fatigue Management Programme paper](#), 24 February 2022:

SHE Risk Management Plan: our [SHE Risk Management plan paper, 16 November 2022](#)

Contact Officer: Lilli Matson, Chief Health, Safety and Environment Officer
Email: LilliMatson@tfl.gov.uk