



AFM



Advanced Fatigue Management (Preparation to apply)

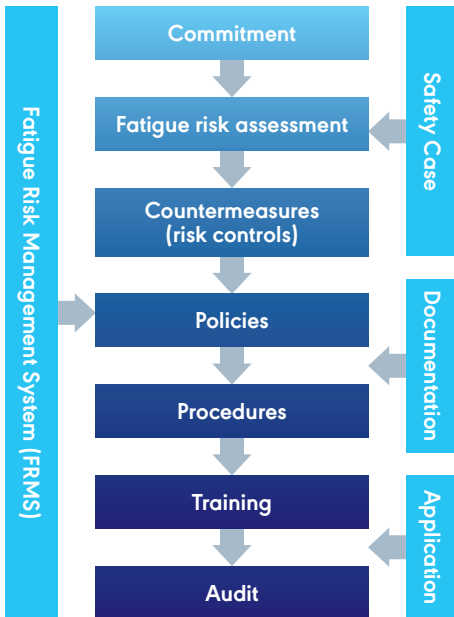
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This booklet will provide you with a greater level of understanding of the seven fatigue management principles and the ten AFM standards and how they relate to the preparation of your AFM application. This booklet will also take you through the practical aspects of preparing to submit an application for AFM including what details you need to think about and include.

There are three steps in getting AFM accreditation:

1. **write a safety case**
2. **document your policies and procedures**
3. **apply to the NHVR for accreditation.**

This booklet explains what is required for each of these steps.



Part 1 – Safety Case

Part 1 of this document provides an overview of your safety case. A safety case contains relevant information about your business as well as an overview of the risks and countermeasures involved with your proposed AFM operations. A safety case is an important document as it is one of the key items the NHVR will review when deciding if your AFM application is suitable for approval.

There are five components in writing a safety case:

1. **committing to AFM accreditation**
2. **describing your business and operations**
3. **describing why you need flexibility for your business**
4. **setting out your desired hours**
5. **assessing the risk of your hours**

Can it be done?

An important consideration throughout your safety case is that you can do what you claim. For your application to be successful, do not say you are going to do things that you either can't or won't realistically do. This means making every claim about controls, countermeasures, policies and procedures relevant to your business and appropriate for your operations.

Before you begin you'll need commitment

Applying for AFM does not have to be a difficult process, but there is going to need to be commitment to the process by the business and the relevant staff. Commitment means that achieving AFM accreditation is a key goal of the business, the development of the required policies and procedures is taken seriously, time is allowed to complete the application process properly and relevant staff understand and accept their role in relation to AFM. AFM, through a Fatigue Risk Management System (FRMS) is a more mature approach to managing safety which means continually exceeding the minimum requirements.

What the NHVR is looking for?

When the NHVR is assessing your application it needs to be satisfied that what you are proposing is not a risk to public safety and that all of your risk controls, policies and procedures can be consistently and effectively applied.

This will include:

- Gaining an understanding of your business profile
- Reviewing your proposed hours and the associated risks
- Analysing your proposed countermeasures

You should be aware that during the assessment the NHVR may need to request additional information from you to help with the assessment of your application.

Documenting your business profile

Although you have a detailed knowledge of how your business operates it is important that you are able to document all of those details so the relevant information can be provided to the NHVR. When your application is being assessed, the business profile helps give some context to your proposed work and rest hours and countermeasures. Your business profile should act as an introduction to your business for the person reading it and include such things as:

TOPIC	DISCUSS
History	When was the business started, how has it grown over the years, have there been any evolutions in how the business operates
Ownership and key staff	Who owns the business, who are the management staff, what family members are involved (if a family run business), what are the experiences and skills of all these people
Number of drivers	How many drivers does the business employ, are they permanent/ part time/ casual, are drivers company employees or contractors, what is the level of driving experience among drivers, have drivers worked for the business long term
Number of vehicles	How many heavy vehicles do you operate, what sort of configurations do you use, what is the age of the vehicles, is there any safety technology in the vehicles
Depot locations	Where are your depots located, how big are your depots, what sort of facilities do they have at them
Types of freight moved	What type of freight do you transport, do you have any regular key customers or contracts
Frequent routes	What routes do you regularly cover, what are some of the challenges of the routes, what times do you normally operate on the routes, what data do you have available regarding your routes (e.g. average travel time etc.)
Potential issues	What are the potential issues that you encounter that standard hours and BFM are not suitable to overcome

Describe the need for AFM

To support your application you should describe why AFM is required within your business. This should have two parts.

Firstly, describe why Standard Hours and BFM are not suitable. This could involve outlining constraints that they place on scheduling and route limitations or any negative impacts these hours cause to your drivers (such as personal fatigue requirements or lifestyle factors).

Refer to the *Examples of operating limits and countermeasures under Advanced Fatigue Management* booklet for examples of Standard and BFM hours challenges that people have used AFM to overcome.

From here you should describe how flexibility under AFM would alleviate these problems. You could include such things as how it would allow you to stage routes more effectively, create more driver friendly rosters and the positive safety impacts.

Remember: while AFM can be used for longer work hours this isn't always the case. AFM may actually be used to work the same or less hours than Standard hours or BFM but with more flexibility about how those limits are used.

Your advantages from AFM

In addition to the specific outcomes you would get from AFM e.g. some of the elements you outlined in the Describe the need for AFM section, you should consider the broader benefits you would unlock and give a brief description of how this would practically effect your business. Commercial advantage or ease of use are two possible types of benefit but you may have others.

- **Commercial advantage**

Commercial advantage may come in many varied forms for an operator using AFM. This may include: the ability to fulfil contracts quicker, being able to demonstrate a strong safety and compliance culture, flexibility to meet changing route conditions and creating a unique set of work and rest hours

for business efficiency, the ability to attract and retain experienced high quality drivers.

- **Ease of use**

Some operators enjoy having AFM within their business for the simplicity it can offer them in terms of managing their fatigue safety and compliance responsibilities. You could potentially create a set of work and rest hours that remove some of the complex rules that are involved with Standard Hours and BFM. This simplification may not only be useful for the performance of the business but also drivers and could assist them with reducing the stress of compliance.

Desired hours

Now that you have laid out the foundations of AFM within your business you can consider what the actual work and rest hours are that you want to apply for. It is very important that you consider what it is you actually want to achieve through AFM and the hours you actually want to have available to use. You shouldn't apply for what you don't need. By applying for unnecessary things or excessive limits for no specific reason, it is possible you will delay and overcomplicate the process for yourself. The hours you wish to apply for should be relatable to the advantages of AFM you have identified.

To assist you with identifying what type of hours may be available and how they have been used in the past refer to the *Setting your own operating limits and countermeasures* booklet.

Also note that the hours you develop will be what your risk ratings will be based on. This is important as your risks will determine what sort of countermeasures you will need to have in place.

Describe in your safety case the outer limits of your proposed schedule. Outer limits means the absolute maximum work time and absolute minimum rest time that applies and any applicable rules.

Example: you may outline that if you work the maximum AFM hours one day you can only work the Standard Hours maximum the next day).

You should describe in this section what your ordinary rostered hours will be and the circumstances that would apply for using the outer limits of your proposed hours.

Example: you might only schedule drivers to BFM hours but allow access to extended AFM hours if there is a traffic jam that stops them from getting back to rest facilities at the depot in time.

Assessing the risks of your hours

It is important that once you have created a schedule of hours that you wish to apply for that you identify the risk that is associated with those hours. You should be aware that it is normal, and expected that the hours proposed in an AFM application will have a degree of risk. Therefore in the process of identifying your risk scores, you should not be discouraged from continuing if you receive some high risk scores. You will need to complete the Fatigue Risk Assessment Tool (available on the NHVR website) to calculate the risk for your AFM Schedule. Your scores will form part of your safety case documentation for inclusion in your application.

The Fatigue Risk Assessment Tool is discussed in detail in the *Overview of Risk and Countermeasures* booklet.

There are 7 fatigue risk principles that apply in AFM:

1. Reduce the time spent continuously working in the work opportunity

This means: taking rest breaks within a shift. Taking more rest breaks within the total length of a shift helps reduce fatigue risk.

2. The more frequent breaks from driving, the better

This means: taking breaks (anything that stops driving) that do not necessarily get recorded as rest breaks. An example of this is stopping after an amount of time

for the driver to get out and stretch their legs. Breaking up the driving helps reduce fatigue risk.

3. Ensure an adequate sleep opportunity in order to obtain sufficient sleep

This means: creating a roster that allows drivers large enough gaps between shifts so that they have an opportunity to get enough sleep.

4. Maximise adequate night sleep

This means: creating a rest structure that gives drivers the opportunity to have their sleep at night time.

5. Minimise shifts ending between 00:00-06:00

This means: trying to reduce the amount of shifts where the driver finishes work between midnight and 6am.

6. Minimise extended shifts

This means: keeping down the number of driver shifts that are long in length.

7. Prevent accumulation of fatigue with reset breaks of at least 30hrs (and include two night periods, 00:00 – 06:00) between work sequences

This means: creating rosters that give the driver a long enough break to fully recover after finishing one set of shifts to refresh before starting a new set.



Part 2 – Document your policies and procedures

Following on from the preparation of your safety case, once you have developed your hours and countermeasures you need to compile the documentation that relates to your policies and procedures that apply to your Fatigue Risk Management System (FRMS). In basic terms your FRMS is the combination of your fatigue policies and procedures and risk controls and countermeasures (safety case). Your FRMS submission will also include the templates and/or forms that are linked to your policies and procedures, for example; a fitness for duty checklist.

Your Fatigue risk management documentation needs to at a minimum, provide an overview of how you meet the 10 AFM Standards. There is no one size fits all approach to documenting a FRMS and how much information is required will depend on a number of factors related to the size and complexity of your business and the nature of your policies. The key thing is that the policies and procedures are relevant to your business and you are able to implement and follow them.

Note: What's the difference between a policy and procedure?

The way individual businesses structure their policies and procedures may vary, however, generally, a policy is a guiding principle used to set direction e.g. a mission statement or rule and a procedure is a set way of doing or achieving something e.g. step by step instructions.

The 10 AFM Standards are summarised in this booklet. To assist you with identifying where you currently meet the standards and any gaps you have, complete the *Advanced Fatigue Management Workbook* – Standards checklist and gap analysis.

- 1. Scheduling and rostering** – scheduling of trips and rostering of drivers must incorporate fatigue management measures.
- 2. Readiness for duty** – drivers are in a fit state to safely perform required duties.
- 3. Fatigue knowledge and awareness** – all personnel involved in the management, operation, administration, participation and verification of the AFM option can demonstrate competency in fatigue knowledge relevant to their position on the causes, effects and management of fatigue and the operator's fatigue management system.
- 4. Responsibilities** – the authorisations, responsibilities and duties of all positions involved in the management, operation, administration, participation and verification of their operations under the AFM option are current, clearly defined and documented and carried out accordingly.
- 5. Internal review** – an internal review system is implemented to identify non-compliances and verify that the activities comply with the AFM Standards and the operator's fatigue management system.
- 6. Records and documentation** – the operator will implement, authorise, maintain and review documented policies and procedures that ensure the effective management, performance and verification of the AFM option in accordance with the standards. Records that demonstrated the compliant operation of the AFM option are collected, stored and maintained to verify compliance.
- 7. Health** – drivers are to participate in a health management system to identify and manage fatigue risks.
- 8. Workplace conditions** – workplace environments and conditions must assist in the prevention of fatigue.

9. Management practices – management practices are to minimise the risks relating to driver fatigue.

10. Operating limits – operating limits will provide drivers and operators with the flexibility to effectively manage fatigue.

The AFM standards are non-prescriptive. That means that they set out the requirement of what you must do but don't tell you how you have to do it. You should think about what is the most effective way of meeting the standard within your business.

Sometimes you may already be doing something that meets the standards but don't have it officially documented. This is likely to be particularly common in smaller sized businesses. If you are in this situation it is important that you write down what it is that you do in order to demonstrate your competence to the NHVR. Documenting a policy or procedure does not need to be lengthy or complex if your business does not require it. Use the AFM Workbook – Standards checklist and gap analysis to discover which of your policies and procedures are already documented.

Templates and forms

It is highly likely that your FRMS related procedures are going to link to templates or forms that are completed as part of a process. The templates and forms are not necessarily mandatory but you may find the commonly used types of forms or templates useful in your business. Common templates and forms that operators use include:

- **Fitness for duty assessment**
Use this to: assess and record that drivers are in a fit state to complete their duties and not suffering from fatigue n.b. you could also use the fitness for duty assessment to screen for drug and/or alcohol impairment
 - **Employee fatigue training register**
Use this to: keep a record of what fatigue related training employees have completed
 - **Incident, accident, near miss and hazard report form**
Use this to: make a record of the details when these incidents occur
 - **Internal review planner**
Use this to: plan out your review schedule for your policies and procedures n.b. you could also use this to plan reviews of your operating limits and countermeasures
 - **Induction letter**
Use this to: provide to drivers to outline that they are inducted into the businesses AFM system.
- **Safe driving plan**
Use this to: check and record that the trip the driver is taking is going to be safe

Part 3 Submitting your application

Training

All drivers, schedulers/supervisors, or managers of drivers or schedulers involved in AFM accreditation must complete (or have completed) units of competency on fatigue risk management. Which units will depend on your organisational structure and how you allocate responsibilities in your FRMS. These units of competency are: TLIF0005 – Apply a Fatigue Risk Management System TLIF0006 – Administer a Fatigue Risk Management System

Entry audit

It is a requirement of AFM that an entry audit occurs. An entry audit is done to ensure that the business is actually completing everything that it says it does in its policies and procedures. This audit must be completed by a NHVAS approved auditor. A full list of NHVAS approved auditors is available on the NHVR website. It is recommended you contact the NHVR to discuss your AFM application and entry audit requirements prior to having it completed. This ensures that you do not waste time and money on an audit before your application is at level that meets the required standards.

Lodging the application

After all of your documents are finalised, any training requirements have been completed and you have discussed the entry audit with the NHVR you will be ready to submit your application for the NHVR to assess. To do this visit www.nhvr.gov.au/forms/nhvr_form/application-details/submission_form and complete the online form and upload your documents.

If you are unable to complete an online application please contact the NHVR on 1300 696 487 or fatigue.management@nhvr.gov.au to discuss completing a written application form.

If you have:	Choose application type:	Choose accreditation module
Existing NHVAS accreditation for mass, maintenance or BFM	Add scheme module to accreditation	Advanced Fatigue Only
No existing NHVAS accreditation	Establish new NHVAS accreditation	Advanced Fatigue Only



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